October 15, 2020

Team Leader, Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency Region 1
City View Plaza, Suite 7000
48 RD. 165 Km. 1.2
Guaynabo, Puerto Rico 00968-8069

Director, Water Quality Area
Environmental Quality Board
P.O. Box 1148
San Juan, Puerto Rico 00910

Subject: **Administrative Order on Consent**
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Final Compliance Report
CEC Project 184-802

Dear Team Leader:

CEC Engineers & Consultants, LLC (CEC) has prepared this letter report to document compliance with the Ordered Provisions of the above-listed Administrative Order on Consent. More specifically, this document has been prepared in accordance with Section XI, number 97b of the Order, which requires that the Respondent (Peñuelas Valley Landfill, LLC (PVL)) submit a Final Compliance Report that includes all necessary supporting documentation to demonstrate compliance with the Order. This document supports the Request for Termination prepared by PVL. In accordance with the Order, this Final Compliance Report will be submitted to the United States Environmental Protection Agency (EPA) and the Puerto Rico Environmental Quality Board (EQB).

1.0 ORDERED PROVISIONS

Section VII of the above-referenced Administrative Order on Consent details requirements with which PVL must comply. Each of the requirements are listed below followed by status of compliance by PVL. The compliance status has been determined based on a review of documentation provided by PVL, included as attachments to this report. The numbering presented below represents the numbering of the Order. In addition, Attachment 1 presents correspondence from EPA dated May 19, 2020 that details the agency's review of the Administrative Record and stating that PVL has reached substantial compliance.

64. Except as otherwise indicated in this Order, Respondent shall comply with the CWA, its NPDES implementing regulations, the 2015 MSGP, and any NPDES permit Respondent subsequently applies for and obtains.

    PVL has complied with the noted regulations, and will continue to comply with these regulations, except as otherwise indicated by the Order.

65. Respondent shall continue to maintain a rain gauge at a suitable location at the Landfill, and shall maintain the rain gauge log for daily data collected at the Landfill to document measurable storm events.

    PVL maintains a rain gauge at the Landfill and has submitted daily data with the Progress Reports submitted on a bi-monthly basis to EPA.

66. Respondent shall continue to maintain a suitable sampling point for Outfall 001 where it can take representative stormwater discharge samples in accordance with Parts 3.2.1, 6.1.3, and B.10 of the 2015 MSGP.

    Outfall 001 has been maintained. The bi-monthly Progress Reports submitted to EPA and EQB included as Attachment 2 include representative photos of the Outfall.

67. Respondent shall continue to conduct Quarterly Visual Assessment of Stormwater Discharges, Benchmark Monitoring, Effluent Limitations Monitoring, and Impaired Waters Monitoring in accordance with Parts 3.2, 6.2.1, 6.2.2, and 6.2.4 of the 2015 MSGP.

    PVL has conducted Quarterly Visual Assessment of Stormwater Discharges along with the required Benchmark, Effluent Limitations, and Impaired Waters Monitoring when there has been an observable discharge from Outfall 001. Since the date of the order, only two quarters have resulted in discharge from the Outfall during normal business hours (4th quarter 2018 and 2nd quarter 2020). Visual assessment and discharge monitoring results were included with the Progress Reports.

68. Respondent shall implement corrective actions and conduct follow-up monitoring as required in Part 4.1 and Part 6.2.2.3 of the 2015 MSGP, respectively, when a discharge exceeds a numeric effluent limit of the parameters listed in Table 2-1 and in Table 8.L-2 of Part 8.L.10 of the permit. Also, Respondent must review and revise, as appropriate, the SWPPP (e.g. sources of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of your control measures) so that the permit's effluent limits are met and pollutant discharges are minimized.

    As shown in the monitoring results included with this report, the site has not exceeded a numeric effluent limit of the parameters listed in Table 2-1 or Table 8.L-2 of the Permit. However, please note that Condition No. 75 of the Order states that beginning on the effective date of the Order (September 26, 2018) and within 365 days of EPA's approval of the Compliance Plan (included in the May 19, 2020 correspondence in Attachment 1), the interim limit of TSS through Outfall 001 is 638.2 mg/L. The latest discharge sample resulted in a TSS value of 175 mg/L which is above the permit limit of 88 mg/L but is below the acceptable interim limit.

69. Immediately upon the Effective Date of this Order, Respondent shall monitor its stormwater discharges through Outfall 001 during normal business hours according to the storm water monitoring conditions, as required in Part 6.1.3 of the MSGP, until Respondent complies with the effluent limit established in the 2015 MSGP for TSS during three (3) consecutive discharge events. Monitoring shall be conducted in accordance with the monitoring procedures established in Parts 6.1.3 and 6.1.4 of the 2015 MSGP, and 40 C.F.R. § 136. The sampling location for Outfall 001 shall be representative of the stormwater discharge monitored.

    PVL has been monitoring stormwater discharges from Outfall 001 during normal business hours. Discharges were observed and sampled during the 4th quarter of 2018 and the 2nd quarter of 2020. PVL, LLC reported no discharges during 2019 and the 1st quarter of 2020. Discharge from Outfall 001 was sampled in October and November 2018 and in June 2020. The TSS concentration in these samples were reported as 36.0 mg/L, 21.0 mg/L, and 175 mg/L, respectively. These are below the interim TSS level of 638.2 mg/L allowed within this Order which is valid through May 19, 2021.

70. Immediately upon the Effective Date of this Order, Respondent shall report the results of the stormwater monitoring required in paragraph 67, above, in accordance with Parts 7.1, 7.2 and 7.4 of the 2015 MSGP.

The stormwater monitoring results have been included with the Progress Reports submitted to EPA, as well as submitted in the netDMR database.

71. Within one hundred and fifty (150) calendar days from the Effective Date of this Order, Respondent shall conduct a comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP.

    On March 22, 2019, a Hydrologic and Hydraulic Study, prepared by CEC Engineers and Consultants, LLC was submitted. This report included a comprehensive engineering analysis of the existing site conditions and of measures that could be implemented to reduce TSS levels in the outfall discharge. This report was approved by EPA in correspondence dated May 19, 2020, included as Attachment 1.

72. Within a hundred and eighty (180) calendar days from the Effective Date of this Order, Respondent shall submit to EPA the Engineering Analysis Report detailing the measures evaluated to bring discharges of TSS through Outfall 001 into compliance with the effluent limits in the 2015 MSGP, and the findings and recommendations of the Engineering Analysis.

    On March 22, 2019, a Hydrologic and Hydraulic Study, prepared by CEC Engineers and Consultants, LLC was submitted. This report was approved by EPA on May 19, 2020, as noted on the correspondence included in Attachment 1.

73. Within thirty (30) calendar days of EPA's approval of the Engineering Analysis Report, Respondent shall submit to EPA, for review and approval, a Compliance Plan that includes:

    - the measures to be implemented based on the findings and recommendations of the Engineering Analysis Report; and
    - a schedule for implementing those measures, which shall not exceed three hundred sixty-five (365) days from the date EPA approves the Compliance Plan, unless otherwise extended in writing by EPA. If requested by Respondent, EPA will provide comments and offer guidance while Respondent develops the Compliance Plan.
    - Upon approval or conditional approval by EPA, the Compliance Plan shall be incorporated by reference into this Order, and shall be enforceable as a part hereof.

The aforementioned engineering report submitted on March 22, 2019, included a Compliance Plan. The Compliance Plan was approved in the May 19, 2020 correspondence from EPA included in Attachment 1.

74. That Respondent's Engineering Analysis and the Engineering Analysis Report shall be conducted, prepared, signed and certified by a licensed engineer who is authorized to conduct the engineering profession in the United States. This licensed engineer shall be knowledgeable in the principles and practices of industrial stormwater controls and pollution prevention, and shall possess the education and ability to assess conditions at the Landfill, and the education and ability to assess the effectiveness of stormwater controls to meet the requirements of the 2015 MSGP.

    The aforementioned report submitted on March 22, 2019, was conducted, prepared, signed and certified by a licensed engineer knowledgeable in the principles and practices of stormwater controls and pollution prevention, specifically related to landfill applications.

75. Beginning on the Effective Date of this Order and within three hundred sixty-five days upon EPA's approval of the Compliance Plan, Respondent is authorized to discharge, as an interim limit, TSS through Outfall 001 in concentrations not to exceed 638.2 mg/L.

    As noted in the May 19, 2020 EPA correspondence, the Compliance Plan was approved effective on the date of the letter; therefore, the interim limit for TSS will end in 365 days from May 19, 2020. PVL will comply with the interim effluent limit accordingly,

76. Respondent shall prepare and submit to EPA written compliance progress reports ("Progress Reports") covering a two-month period that describe the status and progress of Respondent's actions taken to comply with the Ordered Provisions of this Order. Respondent shall submit the Progress Report to EPA on the tenth (10th) day of the month following the end of the two-month period, until this Order is no longer effective or full compliance with this Order has been achieved and EPA notifies Respondent that submissions are no longer required. The first Progress Report is due to EPA by December 10th 2018. If Respondent submits a deliverable to EPA during the compliance filing dates of this Order, Respondent does not have to re-submit such deliverable in future Progress Reports.

PVL has submitted compliance progress reports covering a two-month period describing the status and progress of the actions taken to comply with the Order beginning on December 10, 2018, with subsequent submittals in February, March, June, August, October, and December of 2019, and in February and April of 2020. These reports are included as Attachment 2. The EPA stated that as of May 19, 2020, PVL no longer had to submit Progress Reports.

2.0 TECHNICAL ANALYSIS

In accordance with Section X1, number 97, the Final Compliance Report must include a technical analysis and written statement that the implementation of the non-structural and structural BMPs are in place and working properly to sustain compliance with the TSS effluent limit.

Since issuance of the order, as described and depicted pictorially in the bi-monthly progress reports, PVL has implemented the following measures:

- Ongoing application of mulch to exposed exterior slopes
- Installation of silt fence along toe of exposed slopes and ongoing maintenance/replacement, as necessary
- Daily water spraying of on-site roads to minimize fugitive dust
- Removed sediment from Retention Pond (33,792 cy total) to increase storage and retention/settling time.

Based upon the June 2020 results for TSS of 175 mg/L, the structural and non-structural measures that have been implemented are adequately working to maintain compliance with the interim TSS effluent limit of 638.2 mg/L.

3.0 REQUEST FOR TERMINATION

Based on a review of the documentation provided, PVL has complied with the conditions of the Order. They have implemented non-structural and structural BMPs at the landfill including augmentation of the retention volume of the retention pond, installation of silt fence and mulch on exposed slopes, and road stabilization and as such requests termination of the Order.

4.0 CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

AMY J. KNIGHT
INGENIERO LICENCIADO
LIC. 25169
PUERTO RICO

Amy J. Knight 10/15/2020

Amy J. Knight, Puerto Rico P.E. 25169

Sincerely,

CEC ENGINEERS AND CONSULTANTS, LLC

Amy J. Knight

Amy J. Knight, P.E.
Principal

Barry VanLaarhoven

Barry VanLaarhoven
Vice President

Enclosures: Attachment 1 – EPA Correspondence dated May 19, 2020
Attachment 2 – Progress Reports

ATTACHMENT 1
EPA Correspondence dated May 19, 2020

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA II BUILDING, 7TH FLOOR
ROUTE 165 GUAYNABO, PUERTO RICO 00968

May 19, 2020

VIA EMAIL

Mr. Randy Jansen
President
Peñuelas Valley Landfill, LLC
P. O. Box 918, Punta Santiago
Humacao, Puerto Rico 00741-0918

Re: Peñuelas Valley Landfill
Administrative Order on Consent
Docket Number CWA-02-2018-3104
2015 MSGP Tracking Number PRR053203

Dear Mr. Jansen:

On September 27, 2018, the United States Environmental Protection Agency ("EPA") and Peñuelas Valley Landfill, LLC ("Respondent" or "PVL") entered into an Administrative Order on Consent, Docket Number CWA-02-2018-3104 (the "2018 Order"), to address PVL's violations of Sections 301(a) and 402 of the Clean Water Act (the "Act" or "CWA"), 33 U.S.C. §§ 1311(a) and 1342. The provisions of the 2018 Order superseded the provisions of the Administrative Compliance Order, Docket Number CWA-02-2017-3013 (the "2017 Order"), that EPA issued to Respondent on March 1, 2017, for violations of the National Pollutant Discharge Elimination System ("NPDES") Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("MSGP").[1]

The EPA has performed a review of the administrative record concerning the 2018 Order and it is issuing the following comments concerning PVL's compliance with the Order. The comments follow the numbered paragraphs in Section VII (Ordered Provisions) of the 2018 Order.

- Paragraph 64 (Compliance with CWA) – This is a compliance statement in the 2018 Order that Respondent must always comply with.

- Paragraph 65 (Rain Gauge) – Respondent has complied with the requirements of this paragraph by installing and maintaining a rain gauge a suitable location at the Landfill, and by recording rain data in data log to document measurable storm events. Respondent shall continue to maintain the rain gauge and record rain data to demonstrate compliance with the Quarterly Visual Assessment of Stormwater Discharges and monitoring requirements of the MSGP.

[1] The MSGP was re-issued on June 4, 2015, became effective on the same date and expired on June 4, 2015. Respondent submitted a Notice of Intent ("NOI") form for the Peñuelas Valley Landfill on October 5, 2015. Respondent obtained MSGP's coverage for the Landfill on November 4, 2015. The 2015 MSGP tracking number for the Landfill is PR0053203.

- Paragraph 66 (Sampling Point) – Respondent has established and maintained a sampling point for Outfall 001, where it can take representative storm water discharge samples in accordance with Parts 3.2.1, 6.1.3 and B.10 of the 2015 MSGP. Respondent shall continue to maintain the sampling point for Outfall 001 in order to collect storm water discharge samples in accordance with the requirements of the MSGP.

- Paragraph 67 (Visual Assessment and Monitoring) – Respondent submitted documentation in Quarterly Progress Reports on their performance of, among others, Quarterly Visual Assessment of Stormwater Discharges, Benchmark Monitoring and Effluent Limitations Monitoring. Respondent shall continue to perform these activities in accordance with the requirements of the MSGP.

- Paragraph 68 (Corrective Actions) – Respondent submitted documentation in Quarterly Progress Report on their implementation of corrective actions and monitoring concerning the requirements in Parts 4.1 and 6.2.2.3 of the 2015 MSGP, respectively. Respondent shall continue to perform these activities in accordance with the requirements of the 2015 MSGP.

- Paragraph 69 (Monitoring for Effluent Limits) – Respondent submitted documentation that it had sampled, analyzed and reported on two of the three required storm water discharge events thru Outfall 001. See below:

    - ⇨ The first monitoring result for the sample taken on October 11, 2018, revealed a Total Suspended Solids ("TSS") concentration of 36.0 mg/L, which was below the interim limit of 638.2 mg/l and the effluent limit of 88 mg/L.

    - ⇨ The second monitoring result for the sample taken on November 14, 2018, revealed a TSS concentration of 21.0, which was below the interim limit and the effluent limit.

  Respondent has indicated that it has been unable to sample the third discharge event because a representative storm water discharge had not occurred.

  Respondent shall sample, analyze and report the third storm discharge event in accordance with paragraph 69 of the 2018 Order. In addition to reporting the monitoring event results in NetDMR, as required in Part 7.4 of the 2015 MSGP, PVL shall submit to EPA the laboratory results and the chain of custody within fifteen (15) calendar days of receipt of the laboratory report.

- Paragraph 70 (Reporting of Monitoring Data) – Respondent submitted documentation in Quarterly Progress Reports and entered monitoring data in the NetDMR database on the results of the storm water monitoring it had performed at the sampling point for Outfall 001. Respondent shall continue to perform and report monitoring activities in accordance with the requirements of the 2015 MSGP.

- Paragraph 71 (Comprehensive Engineering Analysis) – Respondent conducted a comprehensive engineering analysis of measures, such as, but not limited to, structural Best Management Practices ("BMPs"), non-structural BMPs, storm water storage, groundwater recharge, and treatment technologies, to comply with the TSS effluent limit established in Part 8.L.10 of the 2015 MSGP.

- Paragraph 72 (Engineering Analysis Report) – By letter dated March 22, 2019, PVL sent to EPA the Engineering Analysis Report. No further action is required concerning the submittal of the Engineering Analysis Report.

- Paragraph 73 (Compliance Plan) – The Engineering Analysis Report included a Compliance Plan. PVL is hereby notified of EPA's approval of the Compliance Plan. PVL shall implement the Compliance Plan.

- Paragraph 74 (Licensed Engineer) – The Comprehensive Engineering Analysis and Engineering Analysis Report was conducted, prepared, signed and certified by a licensed engineer authorized to conduct the engineering profession in the United States. No further action is required concerning this paragraph.

- Paragraph 75 (Interim Limit for TSS)[2] – Since EPA's approval of the Compliance Plan is being notified herein, the interim limit for TSS will end on three-hundred sixty-five (365) calendar days of the date of this letter. Respondent shall comply with the interim effluent limit accordingly.

- Paragraph 76 (Progress Reports) – Respondent submitted the Quarterly Progress Reports corresponding to the period of December 2019 to March 2020. The Quarterly Progress Reports included information and description of non-structural and structural BMPs implemented at the Landfill, such as the augmentation of the retention volume of the retention pond; erosion and sediment controls; (i.e., installation of erosion control blankets, check dams, velocity dissipation devices); and road stabilization. EPA is not requiring PVL to continue to submit Quarterly Progress Reports at this time.

Based on EPA's review of the administrative record for the 2018 Order, PVL has reached substantial compliance, and that the pending compliance activity concerns the performance of the third monitoring event and the submittal of such monitoring data results. Upon compliance with such monitoring event and reporting of the data, EPA strongly recommends PVL to initiate the technical analysis of its implementation of non-structural and structural BMPs to assess whether there are in place and working properly to sustain compliance with the TSS effluent limit.[3]

Finally, please be informed that EPA has issued a guide on the implications of COVID-19 for EPA's Compliance Program, which can be found at the following address:

https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf.

EPA encourages you and your staff to become familiar with the COVID-19 guidance and visit EPA's web site for more information about COVID-19 pandemic at following address:

http://www.epa.gov.

[2] See Part 8.L.10 of the 2015 MSGP for the TSS effluent limit of 88 mg/L.
[3] Please refer to Paragraphs 97-99 (Termination and Satisfaction) of the Order.

If you have any questions concerning this letter and/or the 2018 Order, please contact Ms. Jaime López, Senior Enforcement Officer/Physical Scientist, Clean Water Act Team, at (787) 977-5851, or by email at lopez.jaime@epa.gov.

Sincerely,

Nancy Rodríguez, P.E.
Chief
Multimedia Permits and Compliance Branch

cc: Ángel Meléndez, DNER (via email)
Jaime Jaen, PVL (via email)

ATTACHMENT 2
Progress Reports

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

December 10, 2018

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Progress Report

Dear Team Leader:

The referenced order on consent requires submittal compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the first progress report that under the order is required on December 10th, 2018, and there after every two months on the 10th day of the month.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform a comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP. The budget for this engineering analysis has a budget of $39,530.00. CEC visited PVL on November 7th, to evaluate site conditions and assess the work needed. Currently CEC is preparing the existing conditions map and preparing the hyrogeologic/hydraulic model using HydroCAD software. CEC is actively working on this analysis in order to provide possible alternatives and a work plan. PVL estimates the total cost for engineering, survey and field work will exceed $100,000.00. At this time PVL and CEC do not foresee any issues that would delay the submittal of the engineering analysis on or before the due date required under the order.

The site continues to provide maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new ones installed were needed. In addition, the site also continues to perform road spraying for the control of fugitive dust and periodic road washing is being performed to prevent mud accumulation and potential discharge during heavy rain events.

As part of the sediment control efforts the site has applied mulch on the external slopes of unvegetated areas of the cell. This work was done in-house using site personnel and equipment. A total of 2,260 cubic yards of mulch have been installed to date. The transportation and application cost of the application of the mulch is estimated at $10.00 per cubic yard. The estimated cost to date for mulch application is $22,600.00. The photo below shows the mulch that has been applied to date.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in October 2018 was 9.15 inches. Precipitation for the month on November was 2.74 inches with the second half of the month having only four days with precipitation totaling 0.37 inches. On October

11th the site collected a discharge sample. The TSS result was 36.0 mg/l. Another discharge was sampled on November 14 and had a TSS concentration of 21.0 mg/l. There is variability in the TSS results, but these last two events have been below the regulatory limit established under the permit. The site will continue to monitor future discharges but at this time we have entered the dry season and precipitation is very limited. For the month of December, the site has only recorded 0.03 inches of precipitation. The liquid level in the pond is now approximately one foot below the discharge level. As additional information, the site has observed growth of algae in the sedimentation pond that may affect the total suspended solids in the pond and eventually the discharge. This is also being assessed by CEC in the engineering analysis. The precipitation reports and the sample results are attached for reference.

The statement below follows the requirements of the request for information. The questions and requested presented in the request for information are answered in the attached document.

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén on 787-391-0074 or René Rodríguez on 787-447-2717.

Cordially,

Peñuelas Valley Landfill, LLC.

Randy Jensen
CEO and President

MONTHLY CLIMATOLOGICAL SUMMARY for OCT. 2018

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	78.8	90.3	12:15p	70.7	7:00a	0.0	13.8	0.02	0.7	12.0	2:30p	ENE
2	76.6	90.2	2:15p	69.6	6:15a	0.0	11.6	1.68	0.5	17.0	5:45p	SW
3	77.9	88.6	1:00p	70.2	3:00a	0.0	12.9	0.01	0.4	8.0	11:45a	WNW
4	79.8	90.0	2:45p	73.5	5:00a	0.0	14.8	0.00	0.5	11.0	2:30p	ENE
5	77.4	89.4	12:30p	70.8	6:15p	0.0	12.4	0.85	0.5	13.0	5:45p	ENE
6	75.3	86.1	11:45a	70.5	7:00p	0.0	10.3	0.67	0.2	11.0	12:45p	E
7	77.8	86.2	12:15p	70.5	6:30a	0.0	12.8	0.04	0.2	7.0	1:00p	NE
8	79.1	89.0	3:00p	74.0	4:15a	0.0	14.1	0.33	0.4	10.0	5:15p	NE
9	80.1	88.9	12:45p	73.2	12:00m	0.0	15.1	0.00	0.6	14.0	3:15p	ENE
10	78.1	89.3	11:30a	69.6	12:00m	0.0	13.1	0.00	0.5	14.0	1:15p	ENE
11	75.0	87.9	10:45a	66.3	6:00a	0.0	10.0	0.89	0.6	16.0	1:30p	SW
12	77.3	87.1	1:45p	71.8	8:45p	0.0	12.3	0.19	0.4	16.0	6:30p	SW
13	74.0	83.6	11:15a	71.8	6:45a	0.0	9.0	2.81	0.2	17.0	11:45a	E
14	77.4	86.6	12:15p	71.6	3:30a	0.0	12.4	0.01	0.2	7.0	11:00a	NE
15	78.3	87.9	2:30p	71.8	4:00a	0.0	13.3	0.00	0.3	11.0	2:45p	ENE
16	80.0	91.6	2:15p	71.1	7:00a	0.0	15.0	0.00	0.6	15.0	1:00p	ENE
17	78.6	88.1	1:00p	71.2	4:30a	0.0	13.6	0.10	0.5	17.0	1:15p	ENE
18	79.9	91.4	3:45p	71.4	12:00m	0.0	14.9	0.00	0.8	13.0	1:00p	E
19	77.8	90.6	12:30p	67.8	6:30a	0.0	12.8	0.00	0.8	16.0	5:15p	ENE
20	75.5	88.2	12:45p	67.8	4:15a	0.0	10.5	0.21	0.1	7.0	12:30p	ENE
21	76.4	89.3	3:00p	68.4	5:30a	0.0	11.4	0.01	0.4	10.0	1:15p	W
22	76.5	89.0	1:00p	69.3	6:15a	0.0	11.5	0.24	0.6	14.0	1:30p	ENE
23	77.3	87.9	11:30a	70.2	7:00a	0.0	12.3	0.00	0.5	13.0	1:30p	SW
24	77.9	88.9	4:00p	70.7	7:00a	0.0	12.9	0.16	0.6	10.0	11:45a	SW
25	78.9	88.9	2:45p	72.2	12:15a	0.0	13.9	0.00	0.4	8.0	11:15a	ENE
26	79.6	88.3	2:30p	72.7	12:00m	0.0	14.6	0.00	0.5	10.0	10:45a	ENE
27	77.7	87.9	2:00p	68.3	6:45a	0.0	12.7	0.00	0.6	13.0	1:15p	W
28	75.9	88.7	12:15p	68.6	6:30a	0.0	10.9	0.01	0.1	8.0	12:45p	WSW
29	75.2	88.3	1:15p	67.0	6:00a	0.0	10.2	0.92	0.2	10.0	1:15p	WSW
30	75.8	87.6	2:15p	67.3	6:30a	0.0	10.8	0.00	0.3	9.0	12:15p	WNW
31	77.2	88.4	1:30p	67.5	6:30a	0.0	12.2	0.00	0.4	9.0	2:30p	W
	77.5	91.6	16	66.3	11	0.0	388.1	9.15	0.4	17.0	2	ENE

Max >= 90.0: 6
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 2.81 ON 10/13/18
Days of Rain: 14 (>.01 in) 11 (>.1 in) 2 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

MONTHLY CLIMATOLOGICAL SUMMARY for NOV. 2018

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	77.8	88.1	2:00p	69.0	6:00a	0.0	12.8	0.00	0.8	11.0	12:00p	WNW
2	77.2	89.1	2:15p	68.0	4:15a	0.0	12.2	0.28	0.6	18.0	1:30p	ENE
3	76.6	85.2	12:45p	68.7	3:30a	0.0	11.6	0.00	0.1	8.0	12:45p	E
4	75.7	81.1	2:00p	69.5	10:00p	0.0	10.7	0.00	0.1	8.0	12:15a	ENE
5	75.1	86.6	12:15p	67.8	6:30a	0.0	10.1	0.01	0.6	15.0	1:15p	E
6	75.7	88.2	12:30p	66.9	7:00a	0.0	10.7	0.09	0.6	13.0	1:30p	SW
7	76.0	87.9	12:00p	67.8	6:45a	0.0	11.0	0.00	0.6	11.0	12:15p	NE
8	77.5	87.4	2:15p	69.6	4:15a	0.0	12.5	0.00	0.9	16.0	1:00p	WNW
9	76.9	89.2	12:15p	69.2	6:00a	0.0	11.9	0.32	0.6	12.0	12:45p	WNW
10	77.7	89.7	2:15p	70.7	6:00a	0.0	12.7	0.03	0.3	9.0	12:45p	ENE
11	77.3	87.3	11:15a	71.3	10:45p	0.0	12.3	0.00	0.7	13.0	1:30p	E
12	76.1	87.0	1:15p	68.7	6:45a	0.0	11.1	0.03	0.5	14.0	2:00p	ENE
13	77.8	89.5	3:00p	69.7	7:00a	0.0	12.8	0.01	0.4	14.0	1:45p	ENE
14	77.7	81.3	12:15p	71.9	3:00p	0.0	9.7	1.41	0.1	9.0	1:45p	E
15	75.6	85.5	11:00a	70.1	6:45a	0.0	10.6	0.20	0.5	18.0	11:30a	E
16	76.6	86.9	11:45a	69.8	12:30a	0.0	11.6	0.27	0.5	13.0	2:15p	E
17	77.9	86.4	12:00p	72.1	6:15a	0.0	12.9	0.07	0.4	14.0	1:30p	WNW
18	78.2	86.5	12:15p	72.3	11:45p	0.0	13.2	0.00	0.6	11.0	1:30p	ENE
19	76.5	86.5	2:15p	65.4	7:00a	0.0	11.5	0.00	0.8	16.0	12:45p	E
20	77.6	87.8	1:00p	70.9	9:45p	0.0	12.6	0.00	0.7	16.0	1:45p	E
21	79.0	86.7	12:30p	74.1	12:00m	0.0	14.0	0.00	0.8	15.0	12:45p	E
22	76.2	86.3	3:30p	67.4	6:00a	0.0	11.2	0.00	0.6	15.0	2:00p	WNW
23	74.6	85.8	2:30p	64.9	7:00a	0.0	9.6	0.00	0.7	13.0	12:30p	WNW
24	76.7	87.2	3:45p	69.0	7:15a	0.0	11.7	0.00	0.4	10.0	12:30p	W
25	76.9	88.0	12:30p	67.0	7:00a	0.0	11.9	0.01	0.2	9.0	2:45p	W
26	76.2	87.4	1:15p	66.4	7:15a	0.0	11.2	0.01	0.5	12.0	1:45p	WNW
27	74.9	86.8	12:45p	65.3	6:45a	0.0	9.9	0.00	0.5	12.0	2:15p	WSW
28	75.5	86.5	3:45p	67.9	5:30a	0.0	10.5	0.00	0.5	11.0	11:45a	W
29	74.4	88.5	3:00p	65.6	12:00m	0.0	9.4	0.00	0.3	10.0	3:15p	WNW
30	75.4	88.6	1:45p	60.5	6:00a	0.4	10.1	0.00	0.4	13.0	4:30p	E
	76.5	89.7	10	60.5	30	0.4	344.0	2.74	0.5	18.0	2	ENE

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 1.41 ON 11/14/18
Days of Rain: 9 (>.01 in) 5 (>.1 in) 1 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

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REPORT OF ANALYSIS

Certificate Number: CERT - 26359

October 22, 2018

Customer Name:	EC WASTE	Custody Number:	094099
Contact:	MARIA VIDAL	Sampled Date:	Thursday, October 11, 2018
Customer Address:	P O BOX 918	Sampled Time:	1630 hrs.
	PUNTA SANTIAGO PR 00741-0918	Received Date:	Saturday, October 13, 2018
Phone/Fax:	787-836-3700	Sample Received Time:	0847 hrs.
Contact Email:	mvidal@ecwaste.com	Sample Matrix:	Liquid
Sampled By:	Maria Vidal	Sample Type:	Grab
Sample Received By:	S. Vazquez	Temp Received at Lab:	5 °C
Sample Delivered By:	Maria Vidal	Lab. Sample Number:	AT-18-6082
Project and Sample Description:	Storm Water - Peñuelas Valley Landfill - Tallaboa Peñuelas, PR (PO 32908) Pto de Monitoria		

Parameter	Units	Result	Discharge Limit	Method	Method Detection Limit	Analysis Date	Analysis Time	Analyst
Iron	mg/L	0.698	---	EPA 200.7	0.013	October 16, 2018	1517	MV
Total Suspended Solids	mg/L	36.0	250	SM 2540D	4.0	October 16, 2018	1154	FO

Saira Vázquez Báez
Laboratory Operations Director
Licensed Chemist #5471

ESTADO LIBRE ASOCIADO DE PUERTO RICO
Saira Vázquez Báez
Lic. #5471
QUIMICO LICENCIADO
Oct 22, 2018
A 1687539

X

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ALTOL CHEMICAL ENVIRONMENTAL LABORATORY, INC.
SABANETAS INDUSTRIAL PARK, EDIFICIO M-1380, PONCE PR 00731
PO Box 359 Mercedita, PR 00715
TEL.787-848-6050 FAX: 787-848-6299

IAR International Accreditation Registry

094099

CUSTODY # 194299

Customer Company Name & Address: EC Waste	Customer Contact (Print name & sign): María Vidal / María Vidal
Project Name: Water test - Peñuelas Valley Landfill	
Project Address: Tallaboa Peñuelas PO: 32908	Phone:

TURN AROUND TIME: ☐ Rush ☐ Days ☒ Normal ☐ Invoice to sample ☐ Owner ☐ Consultant

ANALYSIS TYPE		SAMPLE TYPE		SAMPLE MATRIX	# CONTAINERS
☒ Chemical	☐ Microbiology	☐ Source Water	☐ Drinking Water	☒ Liquid	☐ Sterile
ENVIRONMENTAL CONDITION		☐ Waste Water	☐ Food	☐ Solid	2 Plastic
☐ Sunny	☐ Cloudy	☐ Ground Water	☐ Solid Waste	☐ Oil	☐ Glass
☒ Rainy	☐ Windy	☐ Soil	☐ Composite HRS	☐ Sludge	☐ Vials
☐ Fugitive Dust	☐ Other	☐ Seawater	☒ Grab	☐ Other	☐ Other

LAB. SAMPLE # (LAB USE)	DATE	TIME	SAMPLE DESCRIPTION OR SAMPLING POINT NUMBER
18-10-0672	11-Oct-18	4:30 PM	Storm Water (Poste Alcantarilla)

METALS	WET CHEMISTRY		CHROMATOGRAPHY
Aluminum (A,C)	Acidity (A)	Phenol (A)	BTEX (A,E)
Antimony (A,C)	Alkalinity (A)	P. Total (A, B)	BTEX (A)
Arsenic (A,C)	Ammonia (A,B)	Res. Chlorine (A)	Chloroform as TTO (A) (E)
Barium (A,C)	Asbestos (A)	Set. Solids mg/L (A)	Dioxin (A)
Berilium (A,C)	Bicarbonate (A)	Set. Solids ml/L (A)	MEK(A)
Bismuth (A,C)	BOD-5 (A)	Silica (A)	MTBE(A)
Boron (A,C)	Bromide (A)	Solids Total (A)	PCB'S(A) _8082 _608 (A)
Cadmium (A,C)	CaO ___MgO (1)	Sulfate(A)	Pesticide - TTO (A)
Calcium (A,C)	Carbonate (A)	Sulfide UND (D,H,A)	Phenols by GC (A)
Chromium (A,C)	Chloride (A)	Sulfite (A)	TBA (A)
Chromium VI (A,C)	COD (A,B)	Surfactant (A)	TPH _D _G _O (A)
Cobalt (A,C)	Color ADMI (A)	☒ Suspended Solids (A)	TTO (A,E)
Copper (A,C)	Color Pt-Co (A)	TDS (A)	TTO Semi-Volatile (A)
Gold (A)	Conductivity (A)	TKN (A,B)	VOC's - TTO (A,)
Hardness (A,C)	Cyanide (A,D,G)	TOC (A,B)	**MICROBIOLOGY**
☒ Iron (A,C)	D.O (A)	Turbidity (A)	Total Coliform (A,F)
Lead (A,C)	Fluoride (A)		Fecal Coliform (A,F)
Lead (A)	Iodide (A)	**RCRA**	HPC (A,F)
Lithium (A,C)	Iodine (A)	Reactivity (A)	Enterococcus (A,F)
Magnesium (A,C)	MLVSS (A)	Corrosivity (A)	E. Coli 0157 MPN (A,F)
Manganese (A,C)	Moisture (A)	Ignitability (A)	Mold & Yeast (A,F)
Mercury (A,C)	Nitrate & Nitrite (A)	Metals - TCLP (A)	Salmonella (A,F)
Molybdenum (A,C)	Nitrate (A)	Volatile - TCLP (A)	Campylobacter(A,F)
Nickel (A,C)	Nitrite (A)	Semi-Volatile-TCLP (A)	Listeria (A,F)
Potassium (A,C)	O&G Total (A,B)	Pesticide - TCLP (A)	**FOOD ANALYSES**
Selenium (A,C)	O&G TPH (A,B)	Herbicide - TCLP (A)	% Collagen
Silicon (A,C)	Ortho Phosphate (A,B)	TOX (A)	% FAT
Silver (A,C)			% Protein
Sodium (A,C)	O_2 mg/l		Water Activity - Aw
Strontium (A,C)			
Thallium (A,C)	pH su		
Tin (A,C)			
Titanium (A,C)	Temp °C		
Vanadium (A,C)			
Zinc (A,C)	Cl_2 mg/l		

LEGEND PRESERVATION USED

A	Ice (Cool, 4 °C)	E	HCL
B	H_2SO_4	F	Sodium Thiosulfate
C	HNO_3	G	Ascorbic Acid
D	Na OH	H	Zinc Acetate
I	Other		

Comments & Special Instructions:

CONDITIONS OF SAMPLES UPON RECEIPT	TEMPERATURE OF SAMPLE	CONDITION SAMPLE	LABORATORY ACTION
	☐ Room Temperature	☒ Sample Intact	☒ Sample Accepted
Thermometer Serial # M32	☐ Frozen	☒ Properly Preserved	☐ Sample Rejected
	RECEIVED AT 5 °C	☐ Sample Compromised	

Sample Collected & Relinquished by (Print name & sign): María Vidal / María Vidal	Date: 11-Oct-18 Time: 4:30 PM	Received by (Print name & sign): [signature]	Date: Time:	Delivery to Lab. by (Print name & sign): [signature]
Company: EC Waste	Collector ID#	Company:	Collector ID#	Date: 13-Oct-18 Time: 8:47 AM
Relinquished by (Print name & sign):	Date: Time:	Received by (Print name & sign):	Date: Time:	Received at Lab. by (Print name & sign): Saira Vargas Ruiz
Company:	Collector ID#	Company:	Collector ID#	Date: 10/13/18 Time: 8:47

PROCEDURE NO: ALGAP003

All development of our analysis methods meet government regulatory agencies.

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REPORT OF ANALYSIS

Certificate Number: CERT - 26757

November 28, 2018

Customer Name:	EC WASTE	**Custody Number:**	094097
Contact:	MARIA VIDAL	**Sampled Date:**	Wednesday, November 14, 2018
Customer Address:	P O BOX 918	**Sampled Time:**	1500 hrs.
	PUNTA SANTIAGO PR 00741-0918	**Received Date:**	Friday, November 16, 2018
Phone/Fax:	787-836-3700	**Received Time:**	1500 hrs.
Contact Email:	mvidal@ecwaste.com	**Sample Matrix:**	Liquid
Sampled By:	Maria Vidal	**Sample Type:**	Grab
Sample Received By:	S. Aponte	**Temp Rec at Lab:**	3 °C
Sample Delivered By:	J. Arroyo	**Lab. Sample Number:**	AT-18-6700
Project and Sample Description:	Water Test- Peñuelas Valley Landfill - Tallaboa Peñuelas, PR (PO 33770) Storm Water - Pto de Monitoria		

Parameter	Units	Result	Method	Method Detection Limit	Analysis Date	Analysis Time	Analyst
Iron	mg/L	0.198	EPA 200.7	0.0060	November 27, 2018	1127	MV
Total Suspended Solids	mg/L	21.0	SM 2540D	4.0	November 16, 2018	1525	FO

Saira Vázquez Báez
Laboratory Operations Director
Licensed Chemist

ESTADO LIBRE ASOCIADO DE PUERTO RICO
Saira Vázquez Báez
Lic. #5471
QUIMICO LICENCIADO
1687750
NOV 28, 2018

For ISO 17025 Scopes of Accreditation refer to www.altolenterprises.com

IAR ACCREDITED Laboratory

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TEL.787-848-6050 FAX: 787-848-6299

ASOTH 16929

IAR International Accreditation Registry

094087

CUSTODY # 094097

Customer Company Name & Address: EC Waste	Customer Contact (Print name & sign): Maria Vidal
Project Name: Water test	
Project Address: Peñuelas PO. 33770	Phone:

TURN AROUND TIME: Rush | Days | Normal | Invoice to sample: Owner | Consultant

ANALYSIS TYPE		SAMPLE TYPE			SAMPLE MATRIX	# CONTAINERS
X Chemical	Microbiology	Source Water	Drinking Water		X Liquid	Sterile
ENVIRONMENTAL CONDITION		Waste Water	Food		Solid	X Plastic
Sunny	Cloudy	Ground Water	Solid Waste		Oil	Glass
X Rainy	Windy	Soil	Composite	HRS	Sludge	Vials
Fugitive Dust	Other	Seawater	X Grab		Other	Other

LAB. SAMPLE # (LAB USE)	DATE	TIME	SAMPLE DESCRIPTION OR SAMPLING POINT NUMBER
M18-6700	11/14/18	3:00PM	Storm Water Punto Monitoria

11-16-18

Comments & Special Instructions:

METALS		WET CHEMISTRY				CHROMATOGRAPHY	
	Aluminum (A,C)		Acidity (A)		Phenol (A)		BTEX (A,E)
	Antimony (A,C)		Alkalinity (A)		P. Total (A, B)		BTEX (A)
	Arsenic (A,C)		Ammonia (A,B)		Res. Chlorine (A)		Chloroform as TTO (A) (E)
	Barium (A,C)		Asbestos (A)		Set. Solids mg/L (A)		Dioxin (A)
	Berrilium (A,C)		Bicarbonate (A)		Set. Solids ml/L (A)		MIBK(A)
	Bismuth (A,C)		BOD-5 (A)		Silica (A)		MTBE(A)
	Boron (A,C)		Bromide (A)		Solids Total (A)		PCB'S(A) 8082 608 (A)
	Cadmium (A,C)		CaO MgO (1)		Sulfate(A)		Pesticide - TTO (A)
	Calcium (A,C)		Carbonate (A)		Sulfide UND (D,H,A)		Phenols by GC (A)
	Chromium (A,C)		Chloride (A)		Sulfite (A)		TBA (A)
	Chromium VI (A,C)		COD (A,B)		Surfactant (A)		TPH D G O (A)
	Cobalt (A,C)		Color ADMI (A)		X Suspended Solids (A)		TTO (A,E)
	Cooper (A,C)		Color Pt-Co (A)		TDS (A)		TTO Semi-Volatile (A)
	Gold (A)		Conductivity (A)		TKN (A,B)		VOC's - TTO (A)
	Hardness (A,C)		Cyanide (A,D,G)		TOC (A,B)		MICROBIOLOGY
X	Iron (A,C)		D.O (A)		Turbidity (A)		Total Coliform (A,F)
	Lead (A,C)		Fluoride (A)				Fecal Coliform (A,F)
	Lead (A)		Iodide (A)		RCRA		HPC (A,F)
	Lithium (A,C)		Iodine (A)		Reactivity (A)		Enterococcus (A,F)
	Magnesium (A,C)		MLVSS (A)		Corrosivity (A)		E. Coli 0157 MPN (A,F)
	Manganese (A,C)		Moisture (A)		Ignitability (A)		Mold & Yeast (A,F)
	Mercury (A,C)		Nitrate & Nitrite (A)		Metals - TCLP (A)		Salmonella (A,F)
	Molybdenum (A,C)		Nitrate (A)		Volatile - TCLP (A)		Campylobacter(A,F)
	Nickel (A,C)		Nitrite (A)		Semi-Volatile-TCLP (A)		Listeria (A,F)
	Potassium (A,C)		O&G Total (A,B)		Pesticide - TCLP (A)		FOOD ANALYSES
	Selenium (A,C)		O&G TPH (A,B)		Herbicide - TCLP (A)		% Collagen
	Silicon (A,C)		Ortho Phosphate (A,B)		TOX (A)		% FAT
	Silver (A,C)						% Protein
	Sodium (A,C)		O_2 mg/l				Water Activity - Aw
	Strontium (A,C)						
	Thallium (A,C)		pH su		LEGEND PRESERVATION USED		
	Tin (A,C)				A Ice (Cool, 4 °C)	E HCL	
	Titanium (A,C)		Temp °C		B H_2SO_4	F Sodium Thiosulfate	
	Vanadium (A,C)				C HNO_3	G Ascorbic Acid	
	Zinc (A,C)		Cl_2 mg/l		D Na OH	H Zinc Acetate	
					I Other:		

CONDITIONS OF SAMPLES UPON RECEIPT	TEMPERATURE OF SAMPLE	CONDITION SAMPLE	LABORATORY ACTION
Thermometer Serial # 8433	Room Temperature	X Sample Intact	X Sample Accepted
	Frozen	X Properly Preserved	Sample Rejected
	RECEIVED AT 5 °C	Sample Compromised	

Sample Collected & Relinquished by (Print name & sign): María Vidal	Date:	Received by (Print name & sign):	Date: 11/16/18	Delivery to Lab. by (Print name & sign):	
	Time:		Time: 1300		
Company: EC Waste	Collector ID#	Company:	Collector ID#	Date: 11/16/18	Time: 14:45
Relinquished by (Print name & sign): María Vidal	Date:	Received by (Print name & sign):	Date:	Received at Lab. by (Print name & sign):	
	Time:		Time:		
Company:	Collector ID#	Company:	Collector ID#	Date: Nov 16, 18	Time: 1500

PROCEDURE NO: ALGAP008

All development of our analysis methods meet government regulatory agencies.

EC WASTE

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

February 5, 2019

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Second Progress Report

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the second progress report that under the order is required on February 10th, 2019, covering the months of December 2018 and January 2019.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform a comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP. CEC visited PVL as stated in the first report in order to assess the current site conditions. At this time CEC has completed the as-built drainage plan and the site drainage map. CEC has made some preliminary recommendations that are being evaluated and will be submitted with the engineering report no later than February 24th as required in the order (150 days from the order date). At this time PVL and CEC do not foresee any issues that would delay the submittal of the engineering analysis on or before the due date.

The site continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new ones installed where needed. In addition, the site also continues to perform road spraying for the control of fugitive dust and periodic road washing is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC is to increase the current capacity the sedimentation pond. PVL had been waiting for the water to evaporate but two rain events in January have prevented the start of the sediment removal project. The ground must be dry in order to prevent excavators and other heavy equipment from sinking in muddy areas. Since we have entered the local dry season, we expect to begin sediment removal within the next week provided there are no significant rain events.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in December 2018 was 0.08 inches. Precipitation for the month of January 2019 was 1.85 inches with the second half of the month having only four days with precipitation totaling 0.58 inches. Although there have been two consecutive rain events with low TSS levels below the regulatory limit there has been no precipitation that has caused discharges from Pond 1 during the period. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The site will continue to monitor future discharges, but we have entered the dry season and precipitation is very limited. The liquid level in the pond is now approximately 3 feet below the discharge level (see photos below). The precipitation reports are attached for reference.

The statement below follows the requirements of administrative order.

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén at 787-391-0074 or René Rodríguez at 787-447-2717.

Cordially,

PEÑUELAS VALLEY LANDFILL, LLC.

Randy Jensen
CEO and President

MONTHLY CLIMATOLOGICAL SUMMARY for DEC. 2018

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	77.6	86.7	2:00p	70.6	9:30p	0.0	10.5	0.00	0.4	12.0	2:15p	ENE
2	77.2	86.8	12:00p	65.7	1:15a	0.0	9.8	0.00	0.9	14.0	12:45p	WNW
3	78.4	86.8	4:00p	65.8	7:00a	0.0	10.9	0.00	1.0	15.0	11:45a	WNW
4	78.1	87.8	1:15p	66.7	7:30a	0.0	10.6	0.00	0.7	14.0	1:15p	ENE
5	78.1	85.9	3:15p	69.5	2:30a	0.0	10.4	0.00	0.9	16.0	2:15p	NE
6	77.4	87.5	11:45a	66.4	7:45a	0.0	9.8	0.00	0.9	16.0	2:45p	WNW
7	78.1	86.9	3:45p	65.5	2:30a	0.0	10.5	0.00	1.0	14.0	1:00p	ENE
8	76.5	86.9	1:45p	63.5	7:45a	0.0	9.0	0.03	0.5	13.0	12:45p	ENE
9	77.6	85.7	12:45p	67.9	2:30a	0.0	10.1	0.00	1.2	16.0	12:45p	WNW
10	78.0	85.9	2:15p	70.0	7:30a	0.0	10.3	0.01	0.8	15.0	3:45p	NE
11	76.4	85.9	2:00p	67.3	12:00m	0.0	9.1	0.00	0.8	15.0	1:15p	WNW
12	76.5	86.6	2:00p	63.7	2:30a	0.0	9.1	0.00	0.5	10.0	2:30p	W
13	77.0	85.8	12:00p	62.9	2:30a	0.0	9.6	0.00	1.0	13.0	2:30p	ENE
14	79.4	87.4	3:00p	69.2	2:30a	0.0	11.1	0.00	1.0	18.0	11:30a	ENE
15	78.9	86.0	2:15p	70.4	12:00m	0.0	10.7	0.00	0.8	19.0	1:30p	ENE
16	78.2	85.5	2:30p	69.5	12:45a	0.0	10.4	0.00	1.0	16.0	1:30p	E
17	77.1	86.0	1:30p	67.7	12:00m	0.0	9.6	0.00	0.6	11.0	11:15a	WNW
18	74.3	84.5	12:45p	64.4	11:45p	0.0	7.4	0.00	0.4	11.0	1:45p	WNW
19	76.2	86.2	12:45p	62.4	2:15a	0.1	8.8	0.00	0.7	12.0	1:45p	WNW
20	77.9	84.7	2:00p	69.1	12:15a	0.0	10.1	0.00	1.1	19.0	11:30a	WNW
21	76.9	84.9	1:45p	66.4	11:30p	0.0	9.5	0.00	1.0	14.0	12:00p	WNW
22	74.6	85.1	12:00p	63.0	2:30a	0.0	7.5	0.03	0.3	11.0	11:30a	E
23	77.1	86.1	1:00p	66.8	8:00a	0.0	9.4	0.00	0.3	14.0	4:15p	WNW
24	77.7	85.0	3:30p	66.4	2:15a	0.0	9.9	0.00	1.0	14.0	1:30p	WNW
25	76.8	84.6	11:45a	66.9	7:45a	0.0	9.3	0.00	1.0	14.0	12:15p	E
26	77.2	84.7	2:45p	68.9	2:15a	0.0	9.3	0.00	0.5	13.0	3:00p	ENE
27	78.1	85.3	5:00p	67.0	7:45a	0.0	10.2	0.00	0.9	14.0	11:00a	ENE
28	77.6	84.0	12:30p	70.8	8:15a	0.0	9.7	0.01	0.7	14.0	1:00p	ENE
29	78.3	88.3	2:00p	72.1	12:00m	0.0	10.4	0.00	0.9	13.0	3:00p	ENE
30	77.5	88.5	3:00p	67.6	2:30a	0.0	9.6	0.00	1.0	18.0	12:00p	ENE
31	76.1	85.4	1:00p	65.3	2:30a	0.0	8.7	0.00	1.1	14.0	1:30p	W
	77.3	88.5	30	62.4	19	0.1	301.3	0.08	0.8	19.0	15	ENE

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.03 ON 12/08/18
Days of Rain: 2 (>.01 in) 0 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

MONTHLY CLIMATOLOGICAL SUMMARY for JAN. 2019

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	77.9	87.9	3:30p	69.3	1:30a	0.0	10.1	0.00	0.9	15.0	12:15p	E
2	78.4	87.2	1:00p	70.3	8:00a	0.0	10.5	0.00	0.5	14.0	12:45p	NE
3	77.7	87.2	12:30p	69.6	8:00a	0.0	9.9	0.00	1.2	18.0	1:45p	ENE
4	77.2	85.4	12:30p	65.3	2:30a	0.0	9.5	0.00	1.1	19.0	1:45p	W
5	77.5	85.0	12:15p	69.9	12:00m	0.0	9.8	0.00	1.1	20.0	3:15p	WNW
6	77.3	85.1	12:15p	68.1	8:15a	0.0	9.5	0.00	1.0	18.0	1:00p	NW
7	74.7	84.5	12:30p	65.9	2:30a	0.0	7.6	0.03	0.6	13.0	10:45a	ENE
8	76.1	84.5	1:15p	60.8	8:00a	0.1	8.8	0.01	0.8	14.0	2:30p	WNW
9	76.3	84.5	1:45p	68.1	8:15a	0.0	8.7	0.00	0.7	11.0	2:15p	WNW
10	72.2	78.4	10:45a	67.6	12:00m	0.0	5.5	1.23	0.1	10.0	11:00a	ENE
11	74.5	84.3	3:15p	65.4	2:30a	0.0	7.4	0.00	0.2	9.0	2:45p	WSW
12	74.7	85.2	2:45p	63.2	8:15a	0.0	7.5	0.00	0.3	12.0	4:00p	SW
13	74.2	84.0	1:30p	63.0	2:45a	0.1	7.3	0.00	0.9	14.0	4:15p	WNW
14	75.3	84.8	4:00p	62.3	2:15a	0.1	7.9	0.00	0.7	13.0	1:45p	WNW
15	75.2	84.1	2:45p	63.6	1:00a	0.1	8.1	0.00	0.7	13.0	2:15p	WNW
16	74.3	83.0	3:45p	59.9	2:45a	0.3	7.6	0.00	0.8	12.0	11:15a	WNW
17	75.1	80.5	5:15p	70.1	12:30a	0.0	7.9	0.00	0.4	9.0	9:30a	ENE
18	74.8	83.4	4:00p	63.1	8:00a	0.0	7.7	0.00	0.6	13.0	1:15p	WSW
19	73.7	85.0	12:45p	62.6	2:15a	0.1	6.7	0.08	0.8	14.0	1:30p	WNW
20	75.2	83.9	1:45p	63.5	1:45a	0.0	7.6	0.00	1.0	14.0	11:45a	WNW
21	75.4	86.9	1:00p	62.0	2:45a	0.2	8.4	0.00	0.5	12.0	1:15p	ENE
22	76.1	85.6	12:15p	65.9	12:00m	0.0	8.9	0.01	0.6	13.0	1:15p	WNW
23	74.9	84.3	11:45a	65.9	12:15a	0.0	7.8	0.06	0.5	14.0	2:45p	ENE
24	76.0	84.7	3:00p	66.4	10:45p	0.0	8.7	0.00	0.9	16.0	12:30p	WNW
25	73.3	85.1	2:45p	65.4	2:45a	0.0	6.6	0.43	0.5	13.0	2:45p	ENE
26	74.9	82.7	3:30p	63.1	8:15a	0.0	7.5	0.00	0.9	15.0	12:45p	WNW
27	77.1	83.4	12:30p	69.5	8:00a	0.0	9.6	0.00	1.2	15.0	1:15p	WNW
28	76.8	83.9	3:30p	68.9	3:00a	0.0	9.5	0.00	1.0	13.0	12:30p	WNW
29	75.4	84.0	1:45p	63.5	12:00m	0.1	8.1	0.00	0.8	14.0	12:45p	WNW
30	76.9	86.1	1:30p	62.8	12:45a	0.1	9.5	0.00	1.0	12.0	1:45p	WNW
31	74.5	85.2	2:00p	61.9	12:00m	0.2	7.7	0.00	0.8	15.0	3:45p	ENE
	75.6	87.9	1	59.9	16	1.4	257.9	1.85	0.7	20.0	5	ENE

No hubo exorrentia
No discharge

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 1.23 ON 01/10/19
Days of Rain: 5 (>.01 in) 2 (>.1 in) 1 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

March 22, 2019

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Third Progress Report and Engineering Study Delivery

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the third progress report that under the order is required on April 10th, 2019, covering the months of February and March 2019. The order also requires the presentation of a comprehensive engineering analysis of measures within 180 days from the order date. This letter presents the summary of activities conducted in February and March 2019 and present the engineering analysis along with cost estimates and a proposed implementation schedule.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform the comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP. At this time CEC has completed the comprehensive engineering analysis and the conclusions, recommendations, cost estimates and proposed schedule are enclosed for your review.

The site continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new ones installed where needed. In addition, the site also continues to perform road spraying for the control of fugitive dust and periodic road washing is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC is to increase the current capacity the sedimentation pond. PVL began excavation of sediments from the pond during the month of February. A total of 415 loads of sediments were removed using site personnel and equipment. The total volume of material removed is 10,375 cubic yards. The estimated cost for the removal of the sediments using company resources is $4.00 per cubic yard for a total of $41,500.00. There has been no sediment removal during the month of March, but the sediment removal will continue in accordance with the proposed plan included in the engineering analysis.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in February 2019 was 0.27 inches. Precipitation for the month of March 2019 to date is 2.42 inches with only two days with precipitation greater than 0.5 inches. Although there have been two consecutive rain events with low TSS levels below the regulatory limit there has been no precipitation that has caused discharges from Pond 1 during the period. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The site will continue to monitor future discharges, but we have entered the dry season and precipitation is very limited. There is very minimal liquid in the discharge pond and the water is now at the base of the discharge structure (see photos below). The precipitation reports are attached for reference.

The photo below shows the condition of the sedimentation pond and the intermediate berm that divides the discharge side. The photo was taken after the 0.81" rain event of March 15th. At the far end to the left is the overflow point into the discharge pond which is nearly dry. Based on the current and historical weather patterns for the area we do not expect a discharge from Outfall 001 until September or later.

Enclosed you will find the comprehensive engineering analysis, drawings and proposed implementation schedule. It is our interest to bring this matter to closure as soon as practicable but we must keep in mind that a third discharge sample may not be available for collection until September or later.

The statement below follows the requirements of administrative order.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén at 787-391-0074 or René Rodríguez at 787-447-2717.

Cordially,

Peñuelas Valley Landfill, LLC.

Randy Jensen
CEO and President

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

June 6, 2019

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Fourth Progress Report

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the fourth progress report that under the order is required on June 10th, 2019, covering the months of April and May 2019. The order also requires the presentation of a comprehensive engineering analysis of measures within 180 days from the order date. This letter presents the summary of activities conducted in April and May 2019. The engineering analysis was presented to USEPA along with the third progress report.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform the comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP.

The site continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new ones have been installed in key areas of conveyance of storm water run-off. The attached photos show the areas where silt fences have

been installed. In addition, the site also continues to perform road spraying for the control of fugitive dust and periodic road washing is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC is to increase the current capacity the sedimentation pond. PVL using internal resources has been doing excavation of sediments from the pond during the period. This activity is still in progress. During the period there was earth work done to increase the capacity of the intermediate pond. Approximately 392 cubic yards of sediments where scrapped and accumulated for later removal in June. The estimated cost of this earthwork is $1,568.00. In addition, the cost of improvements to drainage channels by installing rock layers and installing silt fences is $4,514.76.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in April 2019 was 1.29 inches. Precipitation for the month of May 2019 was also 1.29 inches with only one day with precipitation greater than 0.5 inches during the two months period. Although there have been two consecutive rain events with low TSS levels below the regulatory limit there has been no precipitation that has caused discharges from Pond 1 during the period. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The site will continue to monitor future discharges, but we have entered the dry season and precipitation is very limited. There is no liquid in the discharge pond and some vegetation has established on the bottom and side slopes. The precipitation reports are attached for reference. Based on the current and historical weather patterns for the area we do not expect a discharge from Outfall 001 until September or later.

The attached photos show the condition of the sedimentation pond and the intermediate berm that divides the discharge side. Also shown are drainage channels and areas that have been protected with rock and silt fences.

It is our interest to bring this matter to closure as soon as practicable, but we must keep in mind that a third discharge sample may not be available for collection until September or later.

The statement below follows the requirements of administrative order.

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén at 787-391-0074 or René Rodríguez at 787-447-2717.

Cordially,

Peñuelas Valley Landfill, LLC.

Randy Jensen
CEO and President

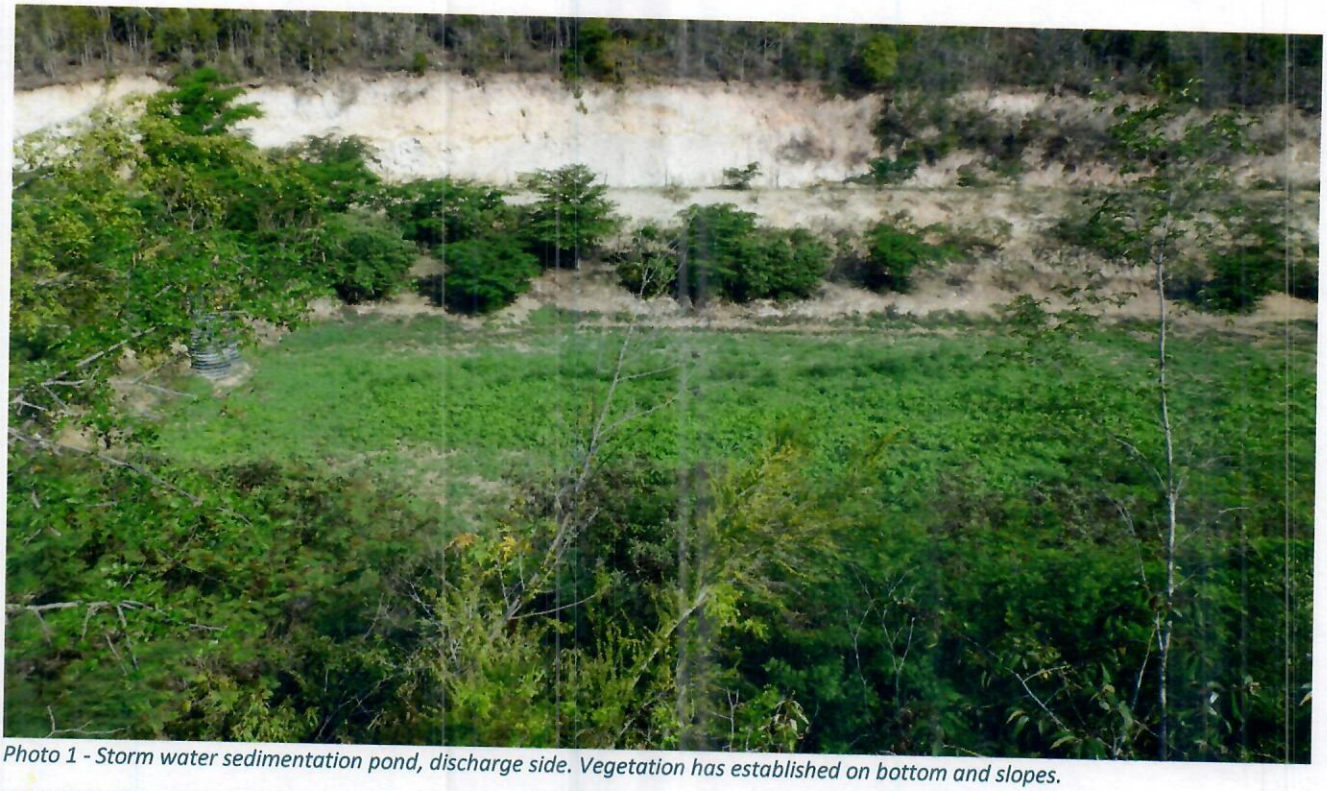

Photo 1 - Storm water sedimentation pond, discharge side. Vegetation has established on bottom and slopes.

Photo 2 - Discharge structure to Outfall 001

Photo 3 - Overview of discharge side of sedimentation pond.

Photo 4 - Vegetated intermediate berm in sedimentation pond.

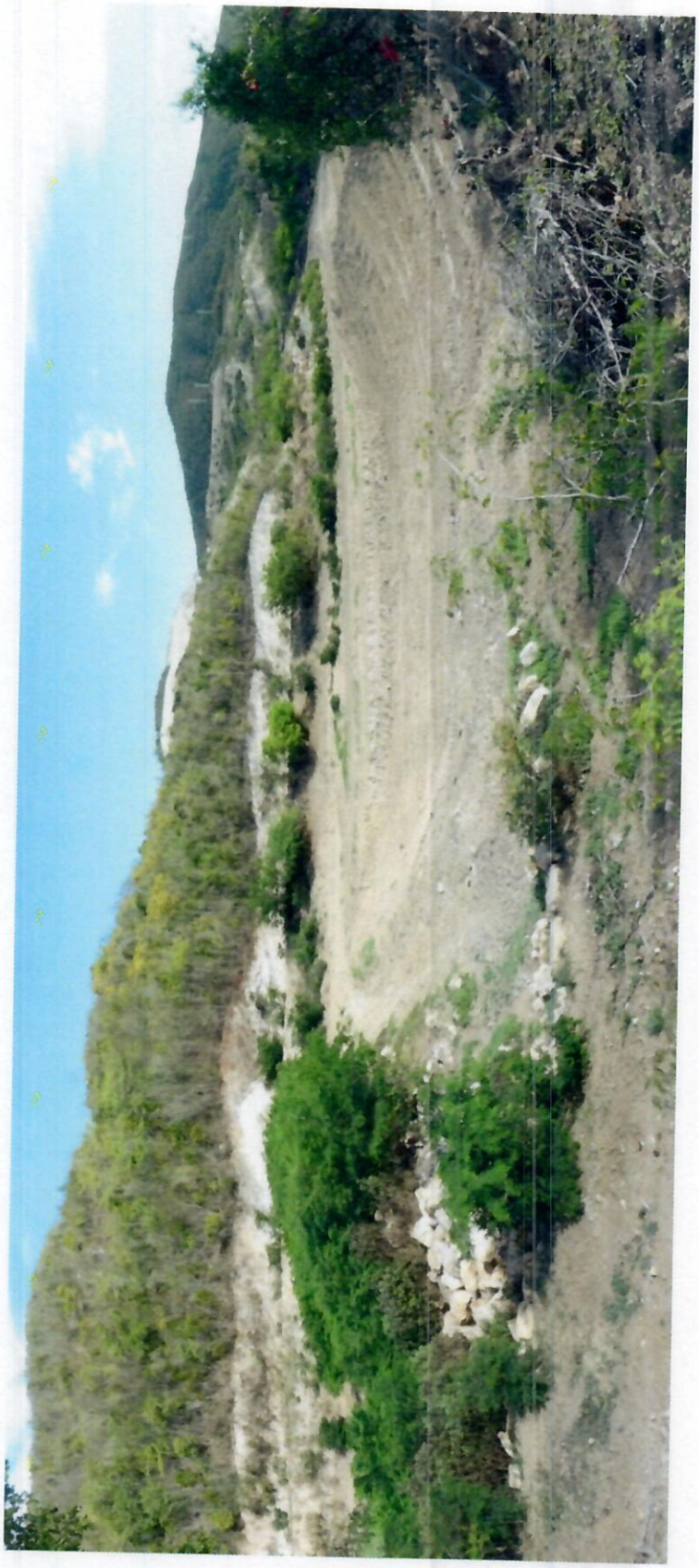

Photo 5 - Panoramic view of intermediate berm and area of excavation for capacity increase.

Photo 6 - Panoramic view showing intermediate berm and area of excavation

Photo 7 - Catchment basin/energy dissipator before entrance to sedimentation pond.

Photo 8- Opposite view of catchment basin at entrance to sedimentation pond.

Photo 9 - Drainage ditch lined with rock and protected with silt fences.

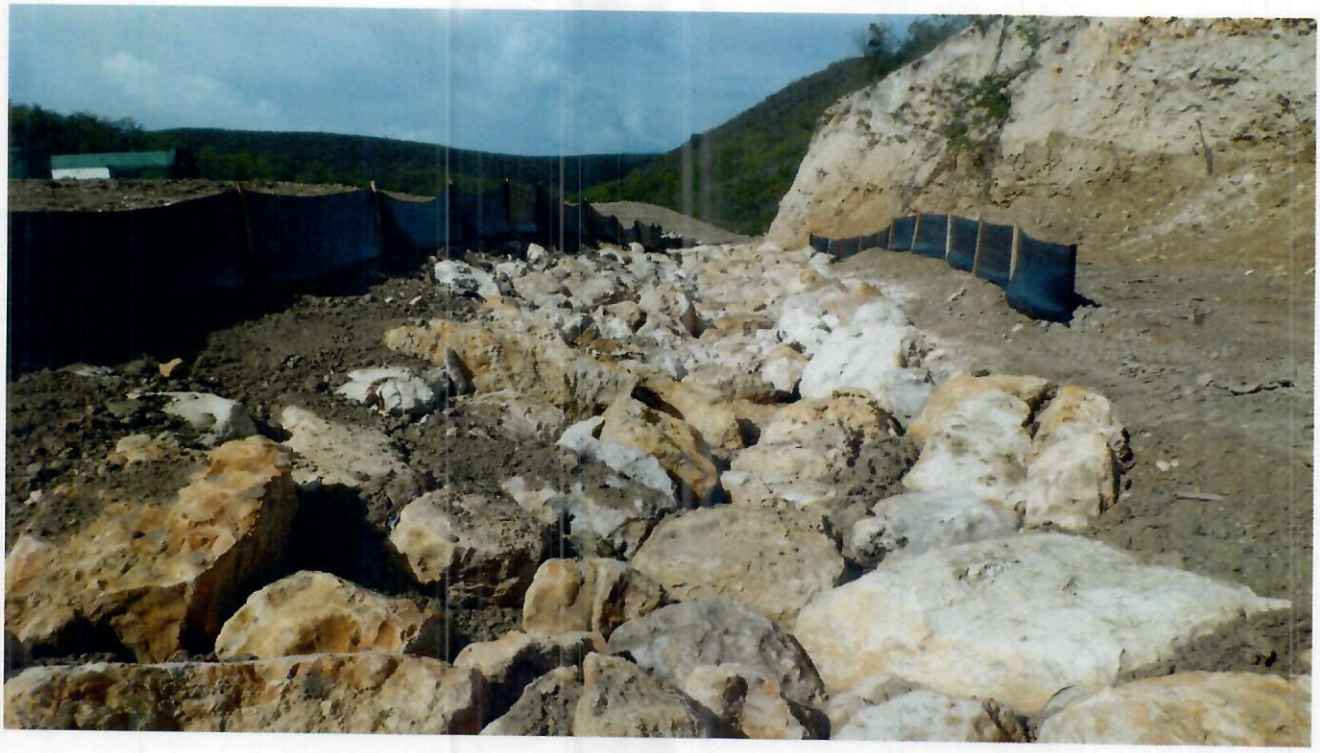

Photo 10 - Drainage ditch lined with rocks and protected with silt fences.

Photo 11 - Undisturbed vegetation on landfill slopes to control erosion.

Photo 12 - Silt fences along excavation areas.

Photo 13 - Silt fences at bottom of landfill slopes.

MONTHLY CLIMATOLOGICAL SUMMARY for APR. 2019

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	76.1	86.6	3:15p	64.9	3:15a	0.0	9.2	0.02	0.6	11.0	2:00p	WNW
2	76.9	85.0	3:30p	65.6	3:00a	0.0	9.9	0.01	1.2	18.0	2:00p	WNW
3	78.0	86.3	2:30p	66.8	3:00a	0.0	10.7	0.00	1.5	17.0	1:45p	WNW
4	78.2	89.7	3:45p	66.0	3:15a	0.0	10.8	0.00	1.3	17.0	2:45p	ENE
5	78.4	85.7	2:45p	68.8	7:15a	0.0	11.1	0.00	1.5	18.0	12:00p	WNW
6	79.0	87.0	1:45p	68.9	12:00m	0.0	11.5	0.00	1.8	18.0	11:15a	WNW
7	77.9	85.4	2:45p	65.8	2:45a	0.0	10.6	0.00	1.6	20.0	1:30p	WNW
8	77.9	85.6	1:00p	66.4	12:00m	0.0	10.7	0.00	1.6	20.0	2:45p	WNW
9	78.1	85.9	3:30p	66.6	12:15a	0.0	10.6	0.00	1.6	16.0	12:45p	WNW
10	75.1	83.9	3:30p	69.2	3:15a	0.0	8.4	0.28	0.6	16.0	2:30p	ENE
11	77.8	85.2	2:45p	70.1	3:00a	0.0	10.6	0.10	0.9	13.0	1:30p	WNW
12	75.8	81.7	2:30p	69.2	12:00m	0.0	8.9	0.58	0.6	13.0	4:00p	ENE
13	77.0	84.8	3:45p	69.2	12:30a	0.0	9.8	0.03	0.9	16.0	4:30p	ENE
14	77.8	85.1	2:45p	70.1	3:15a	0.0	10.6	0.00	1.3	17.0	1:00p	ENE
15	78.6	86.4	1:30p	69.8	7:15a	0.0	11.4	0.00	1.2	15.0	12:45p	NE
16	78.9	86.3	2:15p	67.9	3:30a	0.0	11.7	0.00	1.6	17.0	1:00p	WNW
17	77.7	85.8	2:15p	66.6	2:00a	0.0	10.5	0.00	1.5	16.0	12:45p	WNW
18	78.3	85.8	2:15p	66.3	7:15a	0.0	11.4	0.00	1.4	18.0	11:45a	WNW
19	79.0	85.4	2:30p	70.2	3:00a	0.0	11.6	0.00	1.7	19.0	12:30p	WNW
20	78.9	85.2	3:15p	70.3	3:30a	0.0	11.7	0.00	1.7	20.0	12:15p	WNW
21	78.2	85.9	11:30a	69.2	3:15a	0.0	11.0	0.00	1.4	16.0	10:45a	WNW
22	75.8	84.6	1:00p	68.7	3:00a	0.0	9.0	0.08	0.9	17.0	11:45a	WNW
23	75.8	85.6	2:45p	64.1	3:00a	0.0	9.0	0.00	0.7	13.0	12:00p	WNW
24	74.4	84.4	1:00p	65.8	3:00a	0.0	7.8	0.17	0.5	13.0	12:45p	E
25	77.4	86.4	2:15p	63.3	7:15a	0.0	9.8	0.01	0.9	12.0	2:15p	WNW
26	78.4	87.3	12:30p	65.3	3:00a	0.0	11.2	0.00	1.2	14.0	5:00p	WNW
27	79.8	87.1	12:00p	70.2	3:00a	0.0	12.3	0.00	1.0	14.0	3:15p	WNW
28	79.9	87.0	12:15p	72.1	3:00a	0.0	12.5	0.00	1.2	15.0	2:45p	WNW
29	78.9	86.6	1:30p	71.7	3:00a	0.0	11.1	0.01	1.3	18.0	2:00p	WNW
30	79.2	86.5	1:45p	70.9	3:15a	0.0	11.9	0.00	1.7	20.0	2:15p	WNW
	77.8	89.7	4	63.3	25	0.0	317.3	1.29	1.2	20.0	7	WNW

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.58 ON 04/12/19
Days of Rain: 7 (>.01 in) 3 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

MONTHLY CLIMATOLOGICAL SUMMARY for MAY. 2019

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	80.1	87.8	12:45p	70.6	1:00a	0.0	12.4	0.05	1.3	20.0	3:15p	ENE
2	77.7	84.3	10:45a	69.2	11:15p	0.0	10.7	0.28	0.6	12.0	3:45p	ENE
3	78.3	86.0	1:45p	67.2	3:15a	0.0	11.4	0.00	1.4	16.0	12:15p	WNW
4	79.1	86.0	3:30p	70.2	3:00a	0.0	11.9	0.00	1.5	19.0	5:30p	WNW
5	79.6	87.3	2:00p	69.0	3:15a	0.0	12.4	0.00	1.3	16.0	11:15a	ENE
6	79.3	86.6	3:15p	71.8	3:30a	0.0	12.2	0.00	1.3	16.0	3:45p	ENE
7	79.3	86.1	2:00p	71.1	3:15a	0.0	12.2	0.00	1.6	19.0	12:30p	WNW
8	79.3	86.5	11:15a	69.7	7:00a	0.0	11.8	0.00	1.3	16.0	1:15p	NW
9	79.7	87.3	2:00p	71.1	3:00a	0.0	12.3	0.00	1.1	12.0	11:30a	WNW
10	80.1	87.4	12:00p	69.9	3:00a	0.0	12.6	0.00	0.9	13.0	10:30a	WNW
11	80.1	87.1	2:00p	68.0	3:15a	0.0	12.9	0.00	1.4	15.0	3:00p	WNW
12	81.2	87.2	12:45p	75.0	3:15a	0.0	13.7	0.00	1.6	16.0	10:45a	WNW
13	81.8	88.5	12:45p	73.9	3:00a	0.0	14.2	0.00	1.4	17.0	2:45p	ENE
14	80.8	88.6	1:45p	73.2	3:15a	0.0	12.7	0.00	1.3	16.0	3:00p	W
15	80.5	88.8	12:45p	72.4	3:00a	0.0	13.3	0.00	0.8	14.0	12:30p	WNW
16	81.3	88.8	2:30p	74.2	2:00a	0.0	13.3	0.00	0.8	12.0	1:45p	WNW
17	80.6	88.3	1:30p	72.9	11:45p	0.0	13.0	0.00	1.2	14.0	11:15a	WNW
18	80.6	88.0	1:15p	69.0	2:15a	0.0	13.0	0.00	1.2	16.0	12:30p	WNW
19	80.6	87.5	1:30p	71.3	2:45a	0.0	13.2	0.00	1.3	16.0	11:15a	WNW
20	81.1	87.6	1:00p	72.2	2:15a	0.0	13.7	0.00	1.5	15.0	3:45p	WNW
21	80.5	88.0	2:15p	72.7	3:15a	0.0	13.4	0.16	1.2	15.0	1:15p	WNW
22	80.9	88.6	1:45p	73.6	3:00a	0.0	13.4	0.01	1.1	14.0	1:15p	WNW
23	79.7	87.4	2:00p	70.9	3:15a	0.0	12.4	0.26	1.1	14.0	2:30p	WNW
24	78.0	84.9	10:30a	70.7	3:00a	0.0	11.3	0.05	0.6	12.0	12:00p	ENE
25	80.9	88.7	2:00p	72.7	6:45a	0.0	13.6	0.00	1.2	15.0	2:15p	WNW
26	80.9	89.1	2:15p	72.0	2:30a	0.0	13.3	0.26	1.0	12.0	12:15p	WNW
27	80.0	89.0	12:30p	71.5	2:30a	0.0	12.5	0.00	0.7	16.0	1:15p	ENE
28	79.0	87.0	12:00p	73.1	9:15p	0.0	11.8	0.17	0.8	15.0	2:15p	WNW
29	77.8	85.2	12:00p	72.0	1:30a	0.0	10.1	0.04	0.4	14.0	11:45a	ENE
30	77.2	84.3	2:45p	70.7	11:30p	0.0	10.1	0.00	0.3	10.0	12:45p	ENE
31	80.0	87.4	2:15p	70.9	12:15a	0.0	12.3	0.01	1.4	19.0	1:45p	WNW
	79.9	89.1	26	67.2	3	0.0	387.1	1.29	1.1	20.0	1	WNW

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.28 ON 05/02/19
Days of Rain: 8 (>.01 in) 5 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

WASTE

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

August 2, 2019

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Fifth Progress Report

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the fifth progress report that under the order is required on or before August 7, 2019, covering the months of June and July 2019. The order also requires the presentation of a comprehensive engineering analysis of measures within 180 days from the order date. This letter presents the summary of activities conducted in June and July 2019. The engineering analysis was presented to USEPA along with the third progress report on March 22, 2019.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform the comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP.

The site continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new ones have been installed in key areas of conveyance of storm water run-off. The attached photos show the areas where silt fences have been installed. In addition, the site also continues to perform road spraying for the control of fugitive dust and periodic road washing is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC was to increase the current capacity the sedimentation pond. PVL using internal resources has been doing excavation of sediments from the pond during the period. This activity is still in progress, but within the proposed schedule presented on the engineering report. During the period there was earth work done to increase the capacity of the intermediate pond. Approximately 10,275 cubic yards of sediments. The estimated cost of this earthwork is $41,100.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in June 2019 was 0.14 inches. Precipitation for the month of July 2019 was 0.29 inches. Although there have been two consecutive rain events with low TSS levels below the regulatory limit there has been no precipitation that has caused discharges from Pond 1 during the period. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The site will continue to monitor future discharges, but we have entered the dry season and precipitation is very limited. There is no liquid in the discharge pond and some vegetation has established on the bottom and side slopes. The precipitation reports are attached for reference. Based on the current and historical weather patterns for the area we do not expect a discharge from Outfall 001 until September or later.

The attached photos show the condition of the sedimentation pond and the intermediate berm that divides the discharge side. Also shown are drainage channels and areas that have been protected with rock and silt fences.

It is our interest to bring this matter to closure as soon as practicable, but we must keep in mind that a third discharge sample may not be available for collection until September or later.

The statement below follows the requirements of administrative order.

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén at 787-391-0074 or René Rodríguez at 787-447-2717.

Cordially,

Peñuelas Valley Landfill, LLC.

Randy Jensen
CEO and President

Photo 1 - Storm water sedimentation pond, discharge side. Vegetation has established on bottom and slopes.

Photo 2 - Discharge structure to Outfall 001

Photo 3 - Vegetated intermediate berm in sedimentation pond.

Photo 4 - Panoramic view of intermediate berm and area of excavation for capacity increase.

Photo 5 - Panoramic view showing intermediate berm and area of excavation

MONTHLY CLIMATOLOGICAL SUMMARY for JUN. 2019

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	80.6	87.7	1:15p	71.8	2:30a	0.0	13.0	0.00	1.6	16.0	10:30a	WNW
2	80.7	87.6	2:30p	71.2	2:00a	0.0	12.6	0.00	1.3	16.0	2:45p	WNW
3	81.0	88.6	2:15p	71.2	2:30a	0.0	13.1	0.00	1.0	15.0	12:15p	WNW
4	82.1	89.6	2:00p	72.4	3:00a	0.0	14.4	0.00	1.1	12.0	1:00p	WNW
5	82.2	90.0	1:45p	75.0	2:45a	0.0	14.7	0.00	1.0	14.0	9:45a	WNW
6	82.6	90.0	3:00p	74.2	3:00a	0.0	15.0	0.00	0.9	13.0	1:00p	WNW
7	81.4	88.9	2:15p	73.4	6:45a	0.0	13.8	0.03	0.8	11.0	11:45a	WNW
8	81.7	88.4	1:15p	74.6	2:15a	0.0	13.9	0.00	0.9	18.0	12:30p	ENE
9	82.2	89.6	1:00p	75.6	2:45a	0.0	14.5	0.00	1.2	17.0	12:00p	WNW
10	81.5	87.9	1:30p	75.9	1:45a	0.0	13.2	0.10	1.4	18.0	1:15p	WNW
11	80.9	89.3	2:00p	70.4	3:00a	0.0	13.6	0.00	1.3	15.0	2:00p	WNW
12	81.0	89.0	10:45a	66.9	3:15a	0.0	13.8	0.00	1.8	18.0	12:00p	WNW
13	81.5	90.5	12:30p	72.6	3:00a	0.0	13.9	0.00	1.6	20.0	1:00p	WNW
14	81.2	89.1	1:15p	70.9	6:45a	0.0	14.0	0.00	1.5	18.0	3:30p	WNW
15	82.1	88.6	11:00a	73.2	1:45a	0.0	13.5	0.00	1.3	18.0	12:45p	WNW
16	82.2	89.7	3:00p	70.7	3:15a	0.0	14.9	0.00	1.6	16.0	2:45p	WNW
17	83.4	89.8	2:15p	73.2	2:00a	0.0	15.0	0.00	1.8	23.0	2:30p	WNW
18	83.0	90.8	1:15p	71.5	6:45a	0.0	15.2	0.00	1.9	22.0	11:30a	WNW
19	83.9	91.3	2:30p	75.8	3:00a	0.0	16.2	0.00	1.8	19.0	1:45p	WNW
20	83.9	89.9	10:00a	76.1	3:00a	0.0	16.3	0.00	1.5	18.0	10:15a	ENE
21	82.8	90.3	1:15p	75.4	12:00m	0.0	15.4	0.00	1.6	15.0	3:30p	WNW
22	82.1	89.5	3:30p	70.9	2:45a	0.0	14.4	0.00	1.3	13.0	9:45a	WNW
23	81.6	89.1	3:00p	70.6	6:45a	0.0	14.0	0.00	1.3	14.0	12:15p	WNW
24	82.2	88.9	1:15p	71.4	3:00a	0.0	14.8	0.00	1.4	16.0	12:45p	WNW
25	83.3	90.8	2:15p	74.7	2:45a	0.0	15.3	0.01	1.2	14.0	10:45a	WNW
26	81.2	89.5	1:45p	72.3	3:15a	0.0	14.0	0.00	0.8	14.0	12:30p	WNW
27	82.1	89.6	12:45p	75.1	3:00a	0.0	14.6	0.00	1.4	19.0	12:45p	E
28	83.6	90.6	12:45p	74.6	3:00a	0.0	15.7	0.00	2.0	17.0	11:00a	WNW
29	85.3	91.0	10:15a	76.8	2:15a	0.0	16.5	0.00	1.9	19.0	11:15a	WNW
30	83.7	91.0	1:45p	72.8	11:45p	0.0	15.4	0.00	1.7	19.0	2:00p	WNW
	82.2	91.3	19	66.9	12	0.0	434.7	0.14	1.4	23.0	17	WNW

Max >= 90.0: 10
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.10 ON 06/10/19
Days of Rain: 2 (>.01 in) 0 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

MONTHLY CLIMATOLOGICAL SUMMARY for JUL. 2019

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	82.8	90.5	11:00a	72.4	12:15a	0.0	15.2	0.00	1.2	15.0	9:45a	WNW
2	81.3	89.3	11:15a	70.8	3:15a	0.0	14.1	0.00	1.0	16.0	2:15p	WNW
3	81.8	89.6	1:15p	70.4	3:00a	0.0	14.3	0.00	1.3	15.0	1:15p	WNW
4	83.5	89.6	3:45p	74.5	3:00a	0.0	15.8	0.00	1.8	16.0	1:15p	WNW
5	84.2	90.8	1:30p	78.3	3:15a	0.0	16.2	0.00	1.8	21.0	1:00p	E
6	82.9	90.8	10:30a	74.3	12:00m	0.0	15.5	0.00	1.5	17.0	12:45p	WNW
7	81.3	89.6	1:00p	71.3	3:15a	0.0	13.8	0.00	1.6	18.0	2:45p	WNW
8	83.1	89.8	1:15p	73.7	2:15a	0.0	15.5	0.00	1.5	16.0	12:15p	WNW
9	82.5	90.7	12:45p	76.4	3:00a	0.0	14.9	0.00	0.9	16.0	12:45p	ENE
10	83.3	90.3	1:00p	75.7	2:00a	0.0	15.5	0.00	1.6	18.0	9:15a	WNW
11	82.8	92.9	3:00p	72.0	6:00a	0.0	15.0	0.00	1.4	17.0	2:00p	E
12	79.7	90.2	12:45p	71.6	2:15a	0.0	12.6	0.05	1.1	19.0	12:45p	ENE
13	83.1	89.6	10:45a	71.9	12:15a	0.0	14.9	0.00	1.9	17.0	11:00a	WNW
14	83.5	89.4	12:30p	77.0	2:00a	0.0	15.2	0.00	1.8	17.0	1:30p	WNW
15	84.6	92.9	11:15a	76.5	1:30a	0.0	16.4	0.00	1.8	20.0	1:00p	WNW
16	83.7	90.9	12:15p	72.8	12:00m	0.0	15.6	0.00	1.7	18.0	12:45p	WNW
17	81.2	90.1	12:45p	71.4	2:15a	0.0	13.6	0.00	1.3	18.0	11:30a	WNW
18	84.0	90.7	12:45p	75.5	2:30a	0.0	16.4	0.00	1.8	19.0	9:45a	WNW
19	82.6	91.4	12:00p	75.5	2:30a	0.0	14.9	0.00	1.2	18.0	11:00a	WNW
20	80.3	89.5	11:00a	72.8	12:00m	0.0	12.9	0.05	0.6	14.0	10:30a	ENE
21	79.3	89.3	11:45a	72.4	12:30a	0.0	11.7	0.04	1.0	18.0	11:45a	WNW
22	82.0	89.1	12:15p	70.7	2:30a	0.0	14.7	0.00	1.7	18.0	10:45a	WNW
23	83.8	90.1	12:30p	75.0	2:15a	0.0	16.1	0.00	1.8	18.0	10:45a	WNW
24	83.8	92.4	1:45p	72.6	2:15a	0.0	15.9	0.00	1.6	18.0	11:45a	WNW
25	81.2	91.3	11:15a	70.9	2:15a	0.0	13.6	0.04	0.8	17.0	1:15p	ENE
26	84.4	92.0	1:30p	74.1	2:15a	0.0	16.6	0.00	1.7	24.0	12:45p	WNW
27	85.1	93.5	10:45a	74.4	2:00a	0.0	16.9	0.00	1.5	16.0	12:00p	ENE
28	83.4	90.8	10:30a	70.9	6:00a	0.0	15.0	0.00	1.3	18.0	12:30p	WNW
29	83.6	91.0	12:00p	74.1	1:15a	0.0	15.7	0.01	1.7	20.0	12:45p	ENE
30	78.7	82.1	2:45p	76.0	6:15a	0.0	11.2	0.07	0.0	6.0	8:15a	E
31	81.3	89.5	12:15p	72.3	11:15p	0.0	13.6	0.03	0.9	17.0	1:00p	WNW
	82.5	93.5	27	70.4	3	0.0	459.3	0.29	1.4	24.0	26	WNW

Max >= 90.0: 19
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.07 ON 07/30/19
Days of Rain: 6 (>.01 in) 0 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

October 3, 2019

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Sixth Progress Report

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the sixth progress report that under the order is required on or before October 10, 2019, covering the months of August and September 2019. The order also requires the presentation of a comprehensive engineering analysis of measures within 180 days from the order date. This letter presents the summary of activities conducted in August and September 2019. As mentioned before, the engineering analysis was presented to USEPA along with the third progress report on March 22, 2019.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform the comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP.

The facility continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new ones have been installed in key areas of conveyance of storm water run-off. The attached photos show the areas where silt fence has been installed. In addition, the facility also continues to perform road spraying (with water) for the control of fugitive dust. Periodic road washing is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC was to increase the current capacity the sedimentation pond. PVL, utilizing internal resources, has been excavating sediments from the pond during the period. This activity is still in progress, but within the proposed schedule presented on the engineering report. During this period existing soil and sediment was removed to increase the capacity of the intermediate retention basin. Approximately 2,175 cubic yards of soil/sediment was removed during this period. The estimated cost of this earthwork is $13,050.

The facility has continued to monitor the storm water discharge from Pond 1. Total precipitation in August 2019 was 1.62 inches. Precipitation for the month of September 2019 was 5.55 inches. Although there has been two consecutive rain events with TSS levels below the regulatory limit, there has been no precipitation events that have caused discharges from Pond 1 since November 14, 2018. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The facility will continue to monitor future discharges. There is a small amount of stormwater in the discharge pond, however the stormwater levels are below discharge levels. Additionally, some vegetation has been established on the bottom and side slopes of the discharge pond, indicative of minimal water levels. The precipitation reports for the past two (2) months are attached for reference. Based on the current and historical weather patterns for the area, we do not expect a discharge from Outfall 001 until November or later.

The attached photos show the existing conditions of the sedimentation pond and the intermediate berm that divides the discharge pond. Also shown are drainage channels and areas that have been protected with rip-rap and silt fences.

It is our interest to bring this matter to closure as soon as practicable, but we must keep in mind that a third discharge sample may not be available for collection until November or later.

The statement below follows the requirements of administrative order.

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén at 787-391-0074 or by email jjaen@ecwaste.com Kevin Shaw at 912-659-7179 or by email kshaw@ecwaste.com

Cordially,

Peñuelas Valley Landfill, LLC.

Randy Jensen
CEO and President

Photo 1 - Storm water sedimentation pond, discharge side. Vegetation has established on bottom and slopes.

Photo 2 - Discharge structure to Outfall 001- Small amounts of stormwater present, but still 36" below discharge elevation.

Photo 3 - Sedimentation pond inlet and access road showing silt fences and energy disipators.

Photo 4 - Panoramic view of sedimentation pond inlet showing additional holding capacity.

Photo 5 - Panoramic view showing intermediate berm and area of previous excavation with stormwater.

MONTHLY CLIMATOLOGICAL SUMMARY for AUG. 2019

NAME: PVL1 CITY: STATE:
ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	82.5	88.1	12:00m	78.1	4:00p	0.0	17.5	0.00	7.9	27.0	1:30a	ESE
2	82.6	89.4	4:30a	78.1	6:30p	0.0	17.6	0.07	10.3	31.0	4:00a	E
3	82.9	89.0	2:30a	79.3	11:30a	0.0	17.9	0.00	10.9	37.0	2:30a	E
4	83.5	89.9	2:30a	78.4	7:30p	0.0	18.5	0.00	11.4	37.0	2:00a	SE
5	83.5	89.8	1:00a	78.4	8:00p	0.0	18.4	0.00	13.4	35.0	4:30a	SE
6	81.6	87.3	2:00a	78.6	4:00p	0.0	16.6	0.00	10.6	33.0	2:00a	E
7	81.0	88.3	12:30a	77.0	7:30p	0.0	16.0	0.00	9.5	25.0	2:00a	E
8	81.6	87.3	1:30a	76.2	7:00p	0.0	16.6	0.03	9.6	31.0	1:30a	E
9	82.4	87.1	3:30a	78.7	6:30p	0.0	17.4	0.00	9.8	26.0	2:30a	E
10	82.3	89.0	2:30a	78.4	7:00p	0.0	17.3	0.00	9.8	32.0	2:00a	E
11	81.6	87.9	3:00a	77.9	2:00p	0.0	16.6	0.00	10.3	30.0	2:30a	E
12	82.4	88.2	11:00p	79.0	2:30p	0.0	16.7	0.00	10.4	30.0	12:00m	E
13	82.8	89.0	12:00m	78.7	4:30p	0.0	17.8	0.00	10.4	32.0	4:00a	E
14	83.3	89.8	12:00m	79.8	1:00p	0.0	18.3	0.00	11.2	36.0	12:00m	E
15	84.5	90.9	10:30p	79.3	5:00p	0.0	19.5	0.00	9.8	35.0	1:30a	E
16	83.5	92.0	4:00a	77.4	3:00p	0.0	18.5	0.00	7.0	33.0	12:00m	ENE
17	82.0	88.4	10:30p	78.7	3:30p	0.0	17.0	0.00	10.3	37.0	12:00m	E
18	82.7	88.1	12:30a	79.3	3:30p	0.0	17.7	0.00	10.2	37.0	12:30a	E
19	82.9	89.1	9:30p	79.4	4:00p	0.0	17.9	0.00	8.1	27.0	3:30a	E
20	80.9	88.9	10:00p	76.8	1:00p	0.0	15.9	0.02	7.5	30.0	12:00m	E
21	81.1	88.5	1:00a	75.8	2:30p	0.0	16.1	0.00	8.3	36.0	3:30a	ENE
22	81.6	88.9	12:00m	77.9	12:00p	0.0	16.6	0.00	11.9	33.0	10:30p	E
23	82.7	88.1	12:30a	79.0	4:30p	0.0	17.7	0.00	10.8	32.0	12:30a	E
24	82.8	87.9	11:00p	79.6	5:30p	0.0	17.8	0.00	10.1	29.0	10:30p	E
25	83.0	88.8	12:00m	79.3	1:00p	0.0	18.0	0.00	10.0	29.0	10:30p	E
26	83.4	90.1	12:00m	78.8	4:00p	0.0	18.4	0.00	7.6	26.0	1:00a	E
27	82.0	89.9	10:30p	76.6	6:00p	0.0	17.0	0.00	5.1	28.0	1:30a	ENE
28	77.3	85.4	10:30p	73.8	3:00a	0.0	12.8	1.48	3.7	23.0	12:00m	NW
29	80.4	86.3	11:00p	76.1	5:00a	0.0	15.4	0.02	10.4	25.0	12:00m	E
30	81.9	87.6	12:00m	78.8	4:30p	0.0	16.9	0.00	8.7	30.0	1:30a	E
31	81.8	87.4	11:30p	78.5	4:30p	0.0	16.8	0.00	7.4	22.0	11:00p	E
	82.2	92.0	16	73.8	28	0.0	533.2	1.62	9.4	37.0	3	E

Max >= 90.0: 3
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 1.48 ON 08/28/19
Days of Rain: 5 (>.01 in) 1 (>.1 in) 1 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

MONTHLY CLIMATOLOGICAL SUMMARY for SEP. 2019

NAME: PVL1 CITY: STATE:
ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	81.9	87.4	11:30p	78.2	3:00p	0.0	16.9	0.00	7.7	23.0	9:30p	E
2	82.4	88.1	10:30p	78.7	3:30p	0.0	17.4	0.00	9.2	26.0	10:00p	E
3	82.6	88.9	11:30p	78.9	2:00p	0.0	17.6	0.00	10.1	30.0	12:30a	E
4	83.1	88.5	1:30a	78.7	12:00p	0.0	18.1	0.00	6.8	27.0	9:00p	E
5	80.5	87.6	1:00a	76.5	7:30a	0.0	15.5	0.43	5.8	25.0	1:30a	ENE
6	80.9	87.1	11:30p	78.5	3:00p	0.0	15.9	0.00	7.0	15.0	12:30a	E
7	80.9	87.4	10:30p	76.8	3:30p	0.0	15.9	0.00	5.3	19.0	3:00a	ENE
8	80.0	87.3	11:30p	75.8	5:30a	0.0	15.0	0.35	4.4	20.0	12:00m	ENE
9	82.1	88.3	11:30p	78.8	5:00p	0.0	17.1	0.00	7.1	21.0	12:30a	E
10	82.9	88.4	10:30p	78.6	3:30p	0.0	17.9	0.00	7.8	23.0	1:30a	E
11	83.0	88.7	11:30p	79.3	2:00p	0.0	18.0	0.00	8.2	24.0	12:30a	E
12	82.8	88.7	12:30a	79.4	1:30p	0.0	17.8	0.03	9.3	26.0	10:30p	E
13	83.8	89.7	10:30p	80.1	2:30p	0.0	18.8	0.00	9.6	27.0	1:00a	E
14	84.2	90.8	12:00m	79.8	4:00p	0.0	19.2	0.00	7.9	29.0	12:30a	E
15	82.8	90.9	12:30a	78.5	3:00a	0.0	17.8	0.02	7.7	31.0	11:30p	E
16	80.4	88.4	12:30a	75.7	2:30a	0.0	15.4	0.35	10.7	43.0	1:30a	E
17	81.9	85.3	12:00m	79.3	4:30p	0.0	16.9	0.00	10.6	29.0	1:00a	E
18	78.5	85.9	12:30a	72.7	4:30p	0.0	13.4	1.33	9.8	25.0	3:30a	E
19	81.4	85.4	12:00m	78.2	5:30p	0.0	16.4	0.00	9.1	25.0	1:00a	E
20	82.2	87.7	11:00p	78.4	11:00a	0.0	17.2	0.00	5.2	18.0	12:30a	ENE
21	81.5	87.5	1:00a	74.0	7:30p	0.0	16.5	0.04	8.7	33.0	7:00p	E
22	83.2	87.7	11:30p	80.0	6:00p	0.0	18.2	0.00	9.9	29.0	1:00a	E
23	82.0	88.2	9:30p	77.3	6:00p	0.0	17.0	0.01	5.7	26.0	12:30a	SE
24	77.1	80.9	11:30p	74.8	9:00a	0.0	12.1	1.65	3.6	25.0	9:00a	E
25	78.8	84.4	12:00m	74.6	7:00a	0.0	13.8	0.78	5.4	27.0	12:30a	E
26	81.7	86.2	10:30p	79.0	5:00p	0.0	16.7	0.03	5.8	21.0	1:30a	ENE
27	81.6	86.8	11:30p	77.0	5:30p	0.0	16.6	0.00	3.1	19.0	1:00a	N
28	78.0	86.9	12:30a	73.7	6:30a	0.0	13.0	0.20	3.0	22.0	6:00p	NE
29	80.5	85.3	2:00a	75.4	3:00p	0.0	15.5	0.25	5.6	18.0	11:30p	ENE
30	80.4	85.7	11:00p	77.0	6:30a	0.0	15.4	0.08	8.7	24.0	11:30p	E
	81.4	90.9	15	72.7	18	0.0	493.0	5.55	7.3	43.0	16	E

Max >= 90.0: 2
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 1.65 ON 09/24/19
Days of Rain: 13 (>.01 in) 8 (>.1 in) 2 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

WASTE

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

December 6, 2019

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Seventh Progress Report

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the Seventh progress report that under the order is required on or before December 10, 2019, covering the months of October and November 2019. The order also requires the presentation of a comprehensive engineering analysis of measures within 180 days from the order date. This letter presents the summary of activities conducted in October and November 2019. The engineering analysis was presented to USEPA along with the third progress report on March 22, 2019.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform the comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP.

The site continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new controls have been installed in key areas of conveyance of storm water run-off. The attached photos show

the areas where silt fences and mulch have been installed. In addition, the site also continues to perform road water spraying for the control of fugitive dust and periodic road washing with water is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC was to increase the current capacity the sedimentation pond. PVL, using internal resources, has removed sediment from the pond during the period. This activity was completed November 2019 and has increased the treatment capacity of the sedimentation basin extensively. During the referenced period, additional sediment material/soil was removed. Approximately 10,575 cubic yards of sediment and soil was excavated and removed. The estimated cost of this earthwork is $63,450.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in October 2019 was 2.54 inches. Total precipitation in November 2019 was 3.06 inches. Although there have been two consecutive rain events with low TSS levels below the regulatory limit, there has been no rain events since that time that has caused discharge from Pond 1 during the period. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The site will continue to monitor future discharges, but we have entered the dry season and precipitation during this period is very limited. There is no liquid in the primary (discharge) sedimentation pond, and some vegetation has established on the bottom and side slopes. The precipitation reports are attached for reference. Based on the current and historical weather patterns for the area we do not expect a discharge from Outfall 001 until March 2020 or later.

The attached photographs show the current condition of the primary and secondary sedimentation ponds and the intermediate berm that divides the sedimentation ponds. Also shown are drainage channels and areas that have been protected with riprap, ground wood, and silt fence.

It is our interest to bring this matter to closure as soon as practicable, but we must acknowledge that a third discharge sample may not be available for collection until March 2020 or even later.

The statement below follows the requirements of administrative order.

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén at (787) 391-0074 or by email at *jjaen@ecwaste.com*, or Kevin Shaw at (912) 659-7179 or by email at *kshaw@ecwaste.com*.

Cordially,

Peñuelas Valley Landfill, LLC.

Randy Jensen
CEO and President

Photo 1 - Discharge structure to Outfall 001- No stormwater present near discharge pipe; vegetation has established on pond bottom and side slopes.

Photo 2 - Sedimentation pond inlet showing some vegetation and energy dissipater.

Photo 3 - Panoramic view of sedimentation pond inlet showing additional stormwater holding capacity.

Photo 4 - Panoramic view showing intermediate berm and area of previous excavation with stormwater.

Photo 5 - Panoramic view showing silt fences used to control erosion & sedimentation.

Photo 6 - Panoramic view showing mulch on landfill slopes to control erosion and sedimentation.

OCTOBER 2019 PRECIPITATION REPORT

MONTHLY CLIMATOLOGICAL SUMMARY for OCT. 2019

NAME: PVL1 CITY: STATE:
ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	81.0	84.9	2:00a	78.0	12:30p	0.0	16.0	0.00	7.4	19.0	12:30a	E
2	81.3	85.8	12:00m	78.4	4:30p	0.0	16.3	0.00	7.8	21.0	1:00a	ENE
3	81.3	86.7	11:30p	78.0	11:30a	0.0	16.3	0.00	7.5	20.0	11:00p	ENE
4	81.4	87.1	11:30p	76.4	2:30p	0.0	16.4	0.00	4.9	17.0	1:00a	ENE
5	81.9	87.6	11:00p	79.0	5:00p	0.0	16.9	0.00	7.9	19.0	12:30a	ENE
6	82.0	87.8	11:30p	78.6	1:30p	0.0	17.0	0.00	8.1	28.0	1:30a	E
7	82.9	88.4	11:30p	78.4	6:30p	0.0	17.9	0.00	9.6	29.0	11:00p	E
8	82.0	88.4	1:00a	78.4	3:30p	0.0	15.6	0.00	9.1	29.0	3:30a	E
9	81.0	87.2	12:30a	77.1	8:30a	0.0	16.0	0.00	6.6	27.0	12:30a	ENE
10	79.9	85.6	10:00p	75.5	2:00p	0.0	14.9	0.00	4.1	19.0	10:30p	ENE
11	80.5	87.2	9:30p	76.0	3:30p	0.0	15.5	0.00	5.4	22.0	10:30p	ENE
12	81.6	88.0	9:30p	76.9	3:30p	0.0	16.6	0.00	7.5	19.0	11:30p	ENE
13	81.5	87.7	8:30p	77.9	3:00p	0.0	16.5	0.00	6.9	19.0	9:00p	ENE
14	79.4	85.3	9:30p	74.6	3:00a	0.0	14.4	0.79	6.9	23.0	1:30a	E
15	79.8	85.9	9:30p	75.8	6:30a	0.0	14.8	0.00	5.9	17.0	10:00p	ENE
16	80.8	86.5	9:00p	77.2	3:30p	0.0	15.8	0.00	5.9	20.0	12:00m	ENE
17	78.6	85.6	8:30p	73.4	4:00a	0.0	13.6	0.92	4.4	29.0	2:00a	NE
18	80.9	85.8	10:30p	75.7	1:00p	0.0	15.9	0.00	9.5	25.0	2:30a	E
19	80.2	86.3	9:30p	74.9	4:30a	0.0	15.2	0.13	8.2	29.0	4:00a	ENE
20	81.1	86.7	9:30p	76.3	12:00p	0.0	16.1	0.00	5.8	28.0	11:00p	E
21	79.7	87.2	8:30p	75.5	1:30p	0.0	14.7	0.08	4.4	19.0	9:00p	ENE
22	79.8	86.5	10:00p	75.4	10:30a	0.0	14.8	0.03	6.0	20.0	11:00p	ENE
23	80.3	85.7	10:00p	76.9	5:30a	0.0	15.3	0.00	7.8	28.0	10:00p	E
24	80.3	85.6	10:00p	77.8	10:30a	0.0	15.3	0.04	7.8	27.0	9:30p	E
25	80.1	86.3	8:30p	74.9	3:00p	0.0	15.1	0.00	7.9	28.0	11:30p	E
26	78.8	85.3	10:30p	74.4	5:00a	0.0	13.8	0.53	7.1	26.0	1:30a	ENE
27	81.2	86.2	11:00p	77.9	10:00a	0.0	16.2	0.00	7.3	19.0	1:00a	E
28	80.2	85.9	8:00p	76.6	3:30p	0.0	15.2	0.00	5.5	19.0	1:00a	E
29	79.5	87.1	10:30p	73.9	11:00a	0.0	14.5	0.00	5.1	19.0	8:00p	ENE
30	80.0	86.2	10:00p	75.7	1:00p	0.0	15.0	0.00	5.5	19.0	10:00p	ENE
31	80.1	86.5	9:30p	74.0	12:00p	0.0	15.1	0.02	4.8	18.0	11:30p	ENE
	80.6	88.4	7	73.4	17	0.0	482.7	2.54	6.7	29.0	7	E

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.92 ON 10/17/19
Days of Rain: 8 (>.01 in) 4 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

NOVEMBER 2019 PRECIPITATION REPORT

MONTHLY CLIMATOLOGICAL SUMMARY for NOV. 2019

NAME: PVL1 CITY: STATE:
ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	77.7	84.6	9:00p	73.8	1:30a	0.0	12.7	0.89	7.1	20.0	12:30a	E
2	78.3	83.7	11:00p	73.9	4:30a	0.0	13.3	0.13	7.3	25.0	1:00a	E
3	77.5	84.0	9:30p	72.4	10:30a	0.0	12.5	0.65	5.0	20.0	10:00p	ENE
4	78.7	85.0	11:00p	74.1	4:00a	0.0	13.7	0.27	8.5	29.0	8:30p	E
5	80.7	85.6	10:30p	77.1	4:00p	0.0	15.7	0.00	8.9	29.0	12:30a	E
6	80.4	85.5	10:30p	76.2	6:00a	0.0	15.4	0.00	9.5	28.0	1:00a	E
7	80.4	84.8	10:00p	77.1	12:30p	0.0	15.4	0.00	8.7	26.0	8:30p	E
8	80.3	85.3	9:30p	77.1	12:00p	0.0	15.3	0.00	9.0	26.0	8:00p	E
9	80.7	85.8	9:30p	77.7	4:00p	0.0	15.7	0.02	9.5	25.0	12:30a	E
10	80.4	85.5	10:00p	77.2	11:30a	0.0	15.4	0.00	8.1	24.0	11:00p	E
11	79.6	85.3	9:00p	76.4	3:00p	0.0	14.6	0.00	8.9	25.0	10:00p	E
12	78.9	84.5	10:30p	75.3	2:00p	0.0	13.9	0.01	8.2	20.0	1:30a	ENE
13	80.0	86.1	8:30p	76.5	10:00a	0.0	15.0	0.00	6.9	22.0	11:00p	ENE
14	77.3	85.0	9:00p	72.5	3:30p	0.0	12.3	0.17	5.5	19.0	2:00a	ENE
15	77.1	83.8	10:30p	72.3	1:30p	0.0	12.1	0.13	2.8	16.0	10:30p	NE
16	78.9	85.1	7:30p	74.0	1:00p	0.0	13.9	0.00	2.6	18.0	9:30p	WSW
17	79.3	84.9	8:30p	74.7	12:30p	0.0	14.3	0.00	5.7	20.0	9:00p	ENE
18	79.9	86.6	9:30p	75.8	10:00a	0.0	14.9	0.00	5.8	19.0	10:00p	ENE
19	78.6	84.5	12:30a	74.8	8:00a	0.0	13.6	0.29	3.4	17.0	1:00a	NE
20	78.5	84.2	8:00p	74.4	4:00p	0.0	13.5	0.14	2.9	15.0	9:00p	NW
21	78.2	85.8	10:00p	72.4	1:30p	0.0	13.2	0.03	5.0	26.0	11:30p	ESE
22	78.6	86.0	10:00p	74.7	1:30p	0.0	13.6	0.00	6.0	28.0	7:30p	ESE
23	77.8	84.0	11:00p	71.3	1:00p	0.0	12.8	0.00	4.8	17.0	4:30a	E
24	79.3	85.9	10:00p	75.7	2:30p	0.0	14.3	0.00	8.1	20.0	9:00p	ENE
25	80.7	86.0	8:00p	77.3	11:30a	0.0	15.7	0.00	9.7	30.0	10:30p	E
26	81.0	88.1	9:00p	77.2	3:30p	0.0	16.0	0.00	6.9	22.0	11:00p	E
27	78.7	85.2	9:00p	73.0	1:30p	0.0	13.7	0.27	4.4	24.0	2:00a	ENE
28	77.7	83.8	11:00p	73.0	12:30p	0.0	12.7	0.03	3.2	16.0	11:00p	SSW
29	77.4	83.6	11:00p	71.9	3:30p	0.0	12.4	0.03	4.4	26.0	4:30a	ENE
30	77.9	84.3	9:00p	72.4	4:00p	0.0	12.9	0.00	4.7	21.0	5:30a	ENE
	79.0	88.1	26	71.3	23	0.0	420.5	3.06	6.4	30.0	25	E

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.89 ON 11/01/19
Days of Rain: 13 (>.01 in) 9 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

February 10, 2020

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Eighth Progress Report

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the Seventh progress report that under the order is required on or before February 10, 2020, covering the months of December 2019 and January 2020. The order also requires the presentation of a comprehensive engineering analysis of measures within 180 days from the order date. This letter presents the summary of activities conducted in October and November 2019. The engineering analysis was presented to USEPA along with the third progress report on March 22, 2019.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform the comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP.

The site continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new controls have been installed in key areas of conveyance of storm water run-off. The attached photos show

the areas where silt fences and mulch have been installed. In addition, the site also continues to perform road water spraying for the control of fugitive dust and periodic road washing with water is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC was to increase the current capacity the sedimentation pond. PVL, using internal resources, has removed sediment from the pond during the period. This activity was completed November 2019 and has increased the treatment capacity of the sedimentation basin extensively. During the current reporting period, no additional sediment material/soil was removed.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in December 2019 was 2.34 inches. Total precipitation in January 2020 was 1.68 inches. Although there have been two consecutive rain events with low TSS levels below the regulatory limit, there has been no rain events since that time that has caused discharge from Pond 1 during the reporting period. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The site will continue to monitor future discharges, but we have entered the dry season and precipitation during this period is very limited. There is no liquid in the primary (discharge) sedimentation pond, and some vegetation has established on the bottom and side slopes. The precipitation reports are attached for reference. Based on the current and historical weather patterns for the area we do not expect a discharge from Outfall 001 until March 2020 or later.

The attached photographs show the current condition of the primary and secondary sedimentation ponds and the intermediate berm that divides the sedimentation ponds. Also shown are drainage channels and areas that have been protected with riprap, ground wood, and silt fence.

It is our interest to bring this matter to closure as soon as practicable, but we must acknowledge that a third discharge sample may not be available for collection until March 2020 or even later.

The statement below follows the requirements of administrative order.

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén at (787) 391-0074 or by email at *jjaen@ecwaste.com*, or Kevin Shaw at (912) 659-7179 or by email at *kshaw@ecwaste.com*.

Cordially,

Peñuelas Valley Landfill, LLC.

Randy Jensen
CEO and President

Photo 1 - Discharge structure to Outfall 001- No stormwater present near discharge pipe; vegetation has established on pond bottom and side slopes.

Photo 2 - Sedimentation pond inlet showing some vegetation and energy dissipater.

Photo 3 - Panoramic view of sedimentation pond inlet showing additional stormwater holding capacity.

Photo 4 - Panoramic view showing intermediate berm and area of previous excavation with stormwater.

MONTHLY CLIMATOLOGICAL SUMMARY for DEC. 2019

NAME: PVL1 CITY: STATE:
ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	79.2	84.6	10:00p	75.7	3:00p	0.0	14.2	0.00	8.6	23.0	11:00p	E
2	79.6	85.2	9:30p	74.0	5:30a	0.0	14.6	0.47	8.9	30.0	4:00a	ENE
3	79.7	84.4	12:00m	76.1	4:30p	0.0	14.7	0.00	9.0	24.0	9:30p	E
4	80.2	84.9	11:00p	76.8	1:00p	0.0	15.2	0.00	8.8	23.0	10:30p	E
5	80.2	84.7	11:00p	77.1	4:00p	0.0	15.2	0.00	8.3	24.0	10:00p	E
6	79.9	85.2	11:00p	76.4	6:00a	0.0	14.9	0.00	7.4	24.0	1:00a	E
7	78.0	84.0	9:00p	73.0	12:30p	0.0	13.0	0.34	6.0	21.0	3:30a	ENE
8	78.4	85.2	10:00p	73.7	10:00a	0.0	13.4	0.00	7.3	29.0	11:30p	E
9	79.5	85.5	10:00p	76.0	1:30p	0.0	14.5	0.00	9.4	29.0	11:00p	E
10	79.3	87.4	12:00m	74.2	4:00p	0.0	14.3	0.00	6.8	28.0	8:30p	ESE
11	78.3	85.6	12:30a	72.5	2:00p	0.0	13.3	0.00	6.6	30.0	7:30p	E
12	78.2	85.3	1:00a	72.4	10:00p	0.0	13.2	0.21	8.7	42.0	10:00p	ESE
13	78.0	82.7	10:30p	74.4	4:00p	0.0	13.0	0.00	10.2	34.0	8:00p	E
14	77.0	81.3	12:30a	73.8	5:30p	0.0	12.0	0.10	10.7	34.0	7:30p	E
15	78.1	84.5	9:30p	74.1	11:30a	0.0	13.1	0.18	7.8	37.0	12:00m	E
16	78.0	82.9	9:30p	74.2	12:30a	0.0	13.0	0.05	9.4	37.0	11:30p	E
17	77.1	82.3	9:30p	71.5	5:30a	0.0	12.1	0.68	12.5	35.0	1:30a	E
18	78.3	83.2	10:30p	75.6	12:00p	0.0	13.3	0.00	10.8	32.0	10:00p	E
19	78.0	82.7	9:00p	74.6	1:00p	0.0	13.0	0.00	9.5	26.0	1:30a	E
20	77.3	82.9	9:30p	72.9	10:00a	0.0	12.3	0.00	6.8	29.0	11:00p	SE
21	77.3	83.1	10:00p	73.5	12:30p	0.0	12.3	0.00	8.8	28.0	1:30a	E
22	77.0	82.8	11:30p	72.1	3:00p	0.0	12.0	0.00	9.8	25.0	10:30p	E
23	77.7	82.6	10:00p	75.0	11:00a	0.0	12.7	0.00	10.3	26.0	7:30p	E
24	78.8	82.7	9:30p	76.8	4:00p	0.0	13.8	0.00	8.1	24.0	7:30p	ESE
25	79.3	81.6	9:00p	75.7	12:00m	0.0	14.3	0.21	4.3	20.0	12:30a	WSW
26	77.0	83.9	10:00p	73.5	10:30a	0.0	12.0	0.01	3.1	16.0	5:30a	ENE
27	78.2	85.5	10:00p	72.8	4:30p	0.0	13.2	0.00	3.5	17.0	10:30p	SSE
28	78.7	83.9	9:30p	75.1	4:30p	0.0	13.7	0.00	6.6	24.0	10:30p	E
29	77.5	84.5	9:30p	72.9	9:00a	0.0	12.5	0.00	5.9	25.0	9:00p	E
30	78.7	84.5	10:30p	74.6	3:00p	0.0	13.6	0.00	5.6	18.0	12:30a	E
31	77.2	83.3	12:00m	73.9	7:00a	0.0	12.2	0.09	4.8	15.0	2:00a	E
	78.4	87.4	10	71.5	17	0.0	414.6	2.34	7.9	42.0	12	E

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.68 ON 12/17/19
Days of Rain: 9 (>.01 in) 6 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

MONTHLY CLIMATOLOGICAL SUMMARY for JAN. 2020

NAME: PVL1 CITY: STATE:
ELEV: 0 ft LAT: LONG:

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	76.6	84.1	9:30p	71.7	11:00a	0.0	11.6	0.58	4.0	18.0	2:00a	NE
2	77.9	84.0	12:30a	74.6	3:30p	0.0	12.9	0.04	5.3	25.0	12:00m	ENE
3	75.6	84.6	12:00m	70.8	8:30a	0.0	10.6	0.01	4.5	22.0	1:00a	ENE
4	76.4	82.5	12:30a	70.4	2:00p	0.0	11.4	0.00	3.3	15.0	4:30a	SSE
5	76.9	81.9	8:00p	72.5	10:30a	0.0	11.9	0.00	4.4	16.0	5:30p	ENE
6	75.6	83.4	9:30p	71.7	4:30p	0.0	10.6	0.04	8.5	27.0	10:00p	E
7	77.6	82.2	9:00p	74.8	3:00p	0.0	12.6	0.00	7.8	25.0	2:00a	E
8	77.3	86.3	10:30p	73.0	2:00p	0.0	12.3	0.00	7.7	32.0	12:30a	E
9	78.3	84.9	10:30p	74.9	11:30a	0.0	13.3	0.00	10.3	38.0	9:00p	E
10	78.7	85.7	12:00m	74.6	11:00a	0.0	13.7	0.00	11.3	39.0	9:30p	E
11	78.5	85.2	12:30a	75.2	11:00a	0.0	13.5	0.01	10.7	36.0	11:00p	E
12	78.1	84.1	11:30p	75.0	4:00p	0.0	13.1	0.00	11.5	36.0	8:00p	E
13	77.9	84.1	1:00a	74.4	5:00p	0.0	12.9	0.00	11.3	43.0	11:00p	E
14	77.5	83.3	10:00p	74.1	4:00p	0.0	12.5	0.00	10.9	37.0	7:30p	SE
15	76.9	85.0	10:30p	71.5	12:00p	0.0	11.9	0.00	9.0	31.0	1:30a	E
16	76.9	82.9	12:30a	71.9	4:30p	0.0	11.9	0.00	6.4	22.0	10:30p	E
17	76.3	84.7	12:00m	70.8	6:00p	0.0	11.3	0.00	7.4	29.0	10:30p	E
18	76.3	84.3	12:30a	70.7	1:30p	0.0	11.3	0.00	8.4	32.0	9:00p	E
19	76.7	82.7	9:30p	73.0	10:30a	0.0	11.7	0.00	9.0	30.0	12:30a	E
20	76.4	81.7	11:00p	72.2	12:00p	0.0	11.4	0.01	9.3	27.0	9:30p	E
21	76.0	80.7	12:30a	73.3	4:00p	0.0	11.0	0.04	9.2	22.0	1:00a	E
22	75.6	80.0	1:00a	71.9	12:30p	0.0	10.6	0.11	4.4	18.0	10:30p	E
23	76.0	81.9	10:00p	71.6	2:30p	0.0	11.0	0.04	3.1	18.0	9:00p	E
24	75.7	82.2	10:00p	71.7	1:00p	0.0	10.7	0.40	6.1	19.0	9:00p	ENE
25	75.4	80.2	10:00p	70.9	11:30a	0.0	10.4	0.29	6.4	18.0	8:00a	E
26	76.2	82.0	10:00p	72.5	12:30p	0.0	11.2	0.00	6.0	17.0	11:00p	E
27	76.3	81.1	10:30p	72.0	4:00p	0.0	11.3	0.00	3.0	17.0	1:30a	WSW
28	76.2	81.9	9:00p	71.1	3:30p	0.0	11.2	0.00	3.0	18.0	10:30p	W
29	76.8	82.5	10:00p	71.6	3:30p	0.0	11.8	0.00	5.4	19.0	8:00p	ENE
30	77.4	83.9	10:00p	73.3	3:00p	0.0	12.4	0.00	7.1	22.0	11:00p	ENE
31	76.5	81.9	12:30a	71.1	5:30a	0.0	11.5	0.11	9.0	29.0	10:00p	E
	76.8	86.3	8	70.4	4	0.0	365.5	1.68	7.2	43.0	13	E

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.58 ON 01/01/20
Days of Rain: 9 (>.01 in) 5 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

April 10, 2020

Team Leader
Clean Water Act Team
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Administrative Order on Consent
DOCKET NUMBER CWA-02-2018-3104
Peñuelas Valley Landfill
Eighth Progress Report

Dear Team Leader:

The referenced order on consent requires submittal of compliance progress reports (Progress Reports) covering a two-month period that describe the status and progress of actions taken to comply with the ordered provisions. This is the Ninth progress report that under the order is required on or before April 10, 2020, covering the months of February 2020 and March 2020. The order also requires the presentation of a comprehensive engineering analysis of measures within 180 days from the order date. This letter presents the summary of activities conducted in February and March 2020. The engineering analysis was presented to USEPA along with the third progress report on March 22, 2019.

Peñuelas Valley Landfill (PVL) contracted CEC Engineers and Consultants, LLC. (CEC) to perform the comprehensive engineering analysis of measures, such as, but not limited to, structural BMPs, non-structural BMPs, stormwater storage, groundwater recharge, and treatment technologies, to bring TSS discharges into compliance with the effluent limit established in Part 8.L.10 of the 2015 MSGP.

The site continues to provide routine maintenance to erosion and sedimentation control devices as necessary. Silt fences are being kept in place and new controls have been installed in key areas of conveyance of storm water run-off. The attached photos show

the areas where silt fences and mulch have been installed. In addition, the site also continues to perform road water spraying for the control of fugitive dust and periodic road washing with water is being performed to prevent mud accumulation and potential discharge during rain events.

One initial recommendation by CEC was to increase the current capacity the sedimentation pond. PVL, using internal resources, has removed sediment from the pond during the period. This activity was completed November 2019 and has increased the treatment capacity of the sedimentation basin extensively. During the current reporting period, no additional sediment material/soil was removed.

The site has continued to monitor the storm water discharge from Pond 1. Total precipitation in February 2020 was 0.57 inches. Total precipitation in March 2020 was 1.82 inches. Although there have been two consecutive rain events with low TSS levels below the regulatory limit, there has been no rain events since that time that has caused discharge from Pond 1 during the reporting period. In order to achieve compliance, the AO and the MSGP 2015 require three consecutive compliant discharges. The site will continue to monitor future discharges, but we have entered the dry season and precipitation during this period is very limited. There is no liquid in the primary (discharge) sedimentation pond, and some vegetation has established on the bottom and side slopes. The precipitation reports are attached for reference. Based on the current and historical weather patterns for the area we do not expect a discharge from Outfall 001 until May 2020 or later.

The attached photographs show the current condition of the primary and secondary sedimentation ponds and the intermediate berm that divides the sedimentation ponds. Also shown are drainage channels and areas that have been protected with riprap, ground wood, and silt fence.

It is our interest to bring this matter to closure as soon as practicable, but we must acknowledge that a third discharge sample may not be available for collection until May 2020 or even later.

The statement below follows the requirements of administrative order.

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Should you require additional information please contact Jaime Jaén at (787) 391-0074 or by email at *jjaen@ecwaste.com*, or Kevin Shaw at (912) 659-7179 or by email at *kshaw@ecwaste.com*.

Cordially,

Peñuelas Valley Landfill, LLC.

Randy Jensen
CEO and President

FEBRUARY 2020 PRECIPITATION LOG

MONTHLY CLIMATOLOGICAL SUMMARY for FEB. 2020

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	75.7	85.4	1:30p	66.8	7:30a	0.0	10.7	0.00	0.9	16.0	12:45p	WNW
2	76.1	86.6	1:15p	66.9	6:00a	0.0	11.1	0.00	0.5	10.0	1:30p	WNW
3	75.2	86.4	3:30p	66.8	7:30a	0.0	10.2	0.00	0.5	11.0	11:45a	WNW
4	74.6	85.6	12:45p	64.8	6:45a	0.0	9.6	0.00	0.9	14.0	1:15p	NW
5	76.3	87.6	2:15p	65.8	4:45a	0.0	11.3	0.00	1.3	17.0	2:45p	WNW
6	77.7	86.2	4:00p	70.9	7:15a	0.0	12.7	0.02	1.1	17.0	12:30p	ENE
7	77.8	86.5	1:15p	72.5	7:15a	0.0	12.8	0.00	0.9	14.0	12:15p	E
8	77.0	86.5	2:15p	67.9	7:00a	0.0	12.0	0.00	1.5	16.0	4:15p	E
9	74.8	85.9	2:15p	62.5	5:30a	0.3	10.0	0.00	1.3	17.0	1:30p	NW
10	77.2	86.5	11:45a	67.7	12:15a	0.0	12.2	0.00	1.5	21.0	3:30p	WNW
11	76.7	86.7	2:30p	68.8	1:15a	0.0	11.7	0.00	1.1	18.0	11:15a	E
12	77.5	86.7	11:45a	68.1	6:30a	0.0	12.5	0.00	1.3	19.0	1:00p	E
13	78.2	88.5	1:00p	71.5	6:45a	0.0	13.2	0.00	1.3	19.0	3:00p	E
14	77.0	87.3	1:00p	68.2	4:45a	0.0	12.0	0.00	0.9	23.0	2:15p	E
15	77.2	86.9	12:30p	67.7	6:30a	0.0	12.2	0.00	1.3	16.0	1:30p	WNW
16	77.6	86.3	2:00p	68.1	6:15a	0.0	12.6	0.00	1.3	16.0	2:45p	E
17	78.5	86.0	4:45p	72.8	5:45a	0.0	13.5	0.00	1.5	18.0	1:15p	WNW
18	78.2	87.4	11:30a	70.0	11:15p	0.0	13.2	0.00	1.2	20.0	2:45p	E
19	78.0	87.5	11:45a	71.9	5:15a	0.0	13.0	0.00	1.3	17.0	3:30p	E
20	77.0	86.6	3:00p	66.9	5:00a	0.0	12.0	0.00	1.7	19.0	1:15p	ESE
21	76.0	84.7	1:00p	68.6	3:45a	0.0	11.0	0.06	1.0	16.0	1:00p	WNW
22	74.6	84.6	3:45p	66.0	7:15a	0.0	9.6	0.01	0.5	11.0	10:45a	WNW
23	74.9	84.8	12:15p	66.5	2:15a	0.0	9.9	0.00	0.4	12.0	12:30p	W
24	73.7	84.8	12:00p	67.1	12:00m	0.0	8.7	0.42	0.2	11.0	11:00a	WNW
25	74.1	84.2	11:45a	66.8	12:45a	0.0	9.1	0.05	0.5	12.0	2:15p	WNW
26	74.7	85.6	12:30p	67.6	4:45a	0.0	9.7	0.01	0.9	14.0	12:45p	WNW
27	73.3	85.6	2:45p	61.3	7:00a	0.5	8.8	0.00	0.6	11.0	2:00p	WNW
28	74.9	87.2	2:00p	61.5	6:45a	0.5	10.4	0.00	0.8	13.0	11:15a	WNW
29	75.7	86.0	12:00p	62.4	7:00a	0.3	10.9	0.00	0.8	13.0	2:45p	WNW
	76.2	88.5	13	61.3	27	1.6	326.6	0.57	1.0	23.0	14	WNW

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.42 ON 02/24/20
Days of Rain: 4 (>.01 in) 1 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

MARCH 2020 PRECIPITATION LOG

MONTHLY CLIMATOLOGICAL SUMMARY for MAR. 2020

NAME: PV1 CITY: STATE:
ELEV: 315 ft LAT: 18° 48' 00" N LONG: 66° 42' 00" W

TEMPERATURE (°F), RAIN (in), WIND SPEED (mph)

DAY	MEAN TEMP	HIGH	TIME	LOW	TIME	HEAT DEG DAYS	COOL DEG DAYS	RAIN	AVG WIND SPEED	HIGH	TIME	DOM DIR
1	77.5	86.3	12:45p	68.7	7:15a	0.0	12.5	0.13	0.9	12.0	12:30p	WNW
2	73.5	85.4	12:15p	67.7	7:00a	0.0	8.5	0.66	0.4	12.0	12:15p	WNW
3	75.3	84.2	12:00p	67.4	7:30a	0.0	10.3	0.01	1.1	17.0	1:30p	WNW
4	74.6	86.4	3:15p	64.5	5:45a	0.0	9.7	0.00	1.2	16.0	2:00p	WNW
5	77.1	85.4	2:30p	69.4	6:45a	0.0	12.1	0.00	1.4	17.0	1:00p	ESE
6	76.6	85.5	2:45p	69.0	7:30a	0.0	11.6	0.00	1.0	17.0	10:45a	WNW
7	76.9	86.2	2:00p	65.9	7:30a	0.0	11.9	0.00	0.8	13.0	3:15p	WNW
8	77.2	87.6	1:15p	70.5	7:00a	0.0	12.2	0.00	1.1	15.0	7:30p	E
9	74.7	84.4	12:45p	68.2	12:00m	0.0	9.7	0.07	0.5	12.0	1:15p	E
10	75.6	86.4	12:30p	66.3	7:00a	0.0	10.6	0.00	1.0	14.0	1:45p	WNW
11	75.8	85.9	2:00p	66.6	4:00a	0.0	10.8	0.04	1.1	15.0	12:00p	WNW
12	76.1	86.0	2:15p	67.9	2:45a	0.0	11.1	0.00	1.2	16.0	11:30a	WNW
13	74.1	86.5	1:45p	65.9	5:00a	0.0	9.1	0.25	0.6	12.0	12:00p	E
14	76.3	86.5	1:15p	66.7	2:45a	0.0	11.3	0.00	0.7	13.0	9:15p	E
15	77.3	87.5	2:30p	71.6	5:30a	0.0	12.3	0.00	1.8	18.0	10:45a	E
16	76.3	84.4	1:00p	66.1	6:45a	0.0	11.3	0.00	1.6	16.0	10:30a	E
17	75.5	85.9	2:00p	68.2	3:15a	0.0	10.5	0.01	0.4	10.0	11:45a	E
18	74.7	87.3	12:00p	66.3	3:00a	0.0	9.7	0.07	0.6	13.0	12:15p	E
19	73.9	86.2	11:30a	67.2	5:30a	0.0	8.9	0.12	0.5	16.0	1:15p	E
20	76.5	88.1	2:45p	68.6	12:15a	0.0	11.5	0.01	0.9	13.0	12:15p	E
21	74.2	87.5	1:30p	65.4	6:45a	0.0	9.2	0.13	0.6	12.0	11:45a	E
22	75.7	86.9	12:45p	63.8	4:45a	0.0	10.8	0.00	1.3	19.0	3:45p	E
23	75.1	82.4	9:45a	70.1	12:00p	0.0	10.1	0.26	0.3	8.0	9:15a	E
24	75.8	87.7	1:15p	64.3	6:45a	0.0	10.8	0.00	1.0	18.0	3:30p	E
25	76.5	85.0	11:15a	66.9	3:30a	0.0	11.5	0.00	1.3	17.0	12:45p	NW
26	75.5	85.5	12:15p	67.3	11:45p	0.0	10.5	0.00	0.7	13.0	1:00p	WNW
27	74.2	86.2	2:15p	62.2	6:00a	0.4	9.6	0.05	0.6	11.0	11:45a	N
28	75.8	86.2	12:00p	65.1	6:30a	0.0	10.8	0.01	1.3	17.0	2:15p	WNW
29	76.9	86.6	1:45p	66.7	5:30a	0.0	11.9	0.00	1.6	18.0	3:15p	E
30	75.4	87.7	3:45p	62.1	6:15a	0.4	10.8	0.00	1.1	15.0	4:00p	WNW
31	74.9	86.0	1:15p	62.6	6:15a	0.3	10.2	0.00	1.0	13.0	4:45p	WNW
	75.7	88.1	20	62.1	30	1.1	331.8	1.82	1.0	19.0	22	E

Max >= 90.0: 0
Max <= 32.0: 0
Min <= 32.0: 0
Min <= 0.0: 0
Max Rain: 0.66 ON 03/02/20
Days of Rain: 10 (>.01 in) 6 (>.1 in) 0 (>1 in)
Heat Base: 65.0 Cool Base: 65.0 Method: Integration

Photo 1

Discharge structure to Outfall 001; No stormwater present near discharge pipe; some vegetation has established on pond bottom and side slopes.

Photo 2

Sedimentation pond channel inlet showing some vegetation and rip-rap energy dissipater.

Photo 3

Stock-pile stormwater channel shown with rip-rap energy dissipater along with previous excavation and stormwater.

Photo 4

Panoramic view of sedimentation pond rip-rap outlet showing additional stormwater holding capacity and established vegetation.

Photo 5

Panoramic view showing rip-rap lined intermediate berm and area of previous excavation with stormwater.

Photo 6

Sedimentation pond channel inlet showing some vegetation and rip-rap energy dissipater and area of previous excavation with stormwater.

Peñuelas Valley Landfill, LLC.
PO Box 918
Punta Santiago, PR 00741-0918

August 10, 2020

Ms. Nancy Rodriguez, P.E, Chief
Multimedia Permits and Compliance Branch
Caribbean Environmental Protection Division
US Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
Guaynabo, PR 00968-8069

Director, Water Quality Area
Department of Natural Resources and Environment
PO Box 11488
San Juan, PR 00910

Re: Peñuelas Valley Landfill
Administrative Order on Consent
Docket Number CWA-02-2018-3104
2015 MSGP Tracking Number PRR053203
Request for Closure of AO on Consent

Dear Ms. Rodriguez:

Peñuelas Valley Landfill, LLC. (PVL) acknowledges receipt of your May 19, 2020 communication on the referenced Administrative Order of Consent (the same was received by email in late July 2020). In said letter, EPA states that "based on EPA's review of the administrative record of the 2018 Order, Peñuelas Valley Landfill (PVL) has reached substantial compliance, and that the pending compliance activity concerns the performance of the third monitoring event and the submittal of such monitoring data results…". This Request for Closure of the Administrative Order on Consent presents the results of the third monitoring event.

In accordance with Paragraph 69 (Monitoring for Effluent Limits), PVL has previously submitted documentation that it had sampled, analyzed and reported on two of the three required storm water discharge events through Outfall 001 as described below:

- The first monitoring result for the sample taken on October 11, 2018, revealed a Total Suspended Solids ("TSS") concentration of 36.0 mg/L, which was below the interim limit of 638.2 mg/L and the effluent limit of 88 mg/L.
- The second monitoring result for the sample taken on November 14, 2018, revealed a TSS concentration of 21.0 mg/L, which was below the interim and effluent limit.

The third of three required storm water discharge events through Outfall 001 is described below:

- The third monitoring result for the sample taken on June 29, 2020 (included with this letter as Attachment A), revealed a TSS concentration of 175 mg/L, which is below the interim limit of 638.2 mg/L.

Therefore, PVL is formally submitting the laboratory results and chain of custody of the third required storm water discharge events through Outfall 001 and is requesting EPA to Close the referenced Administrative Order.

The statement below follows the requirements of administrative order.

> *"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Should you require additional information please contact Jaime Jaén at (787)391-0074 or by email at *jjaen@ecwaste.com*, or Kevin Shaw at (912)659-7179 or by email at *kshaw@ecwaste.com*.

Cordially,

PEÑUELAS VALLEY LANDFILL, LLC.

Randy Jensen
President & CEO

ALCHEM
ALTOL CHEMICAL ENVIRONMENTAL LABORATORY INC.

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REPORT OF ANALYSIS

Certificate Number: CERT - 37982

July 14, 2020

Customer Name:	EC WASTE	**Custody Number:**	105454
Contact:	MARIA VIDAL	**Sampled Date:**	Monday, June 29, 2020
Customer Address:	P O BOX 918	**Sampled Time:**	1335 hrs.
	PUNTA SANTIAGO PR 00741-0918	**Received Date:**	Tuesday, June 30, 2020
Phone/Fax:	787-836-3700	**Sample Received Time:**	1230 hrs.
Contact Email:	mvidal@ecwaste.com	**Sample Matrix:**	Liquid
Sampled By:	MARIA VIDAL	**Sample Type:**	Grab
Sample Received By:	C. Lopez	**Temp Received at Lab:**	pH Indicator Strip Lot # HC998032 & #Term 8433/ 4 °C
Sample Delivered By:	J. Arroyo	**Lab. Sample Number:**	AT-20-3527
Project and Sample Description:	Water Test- Peñuelas Valley Landfill - Tallaboa Peñuelas, PR Storm Water - Punto de Monitoría		

Parameter	Units	Result	Discharge Limit	Method	Method Detection Limit	Analysis Date	Analysis Time	Analyst
Iron	mg/L	0.196	---	EPA 200.7	0.013	July 9, 2020	1108	AR
Total Suspended Solids	mg/L	175	250	SM 2540D	4.0	July 3, 2020	0923	FO

Saira Vazquez Baez

Saira Vázquez Báez
Laboratory Operations Director
Licensed Chemist #5471

ESTADO LIBRE ASOCIADO DE PUERTO RICO
Saira Vázquez Báez
Lic. #5471
QUIMICO LICENCIADO

$1.00 $1.00 A 1800342 July 14, 2020

CERTIFIED BY PUERTO RICO DEPARTMENT OF HEALTH FOR DRINKING WATER- CERTIFICATION NUMBER PR 00947

ALCHEM
ALTOL CHEMICAL ENVIRONMENTAL LABORATORY INC.

ALTOL CHEMICAL ENVIRONMENTAL LABORATORY, INC.
SABANETAS INDUSTRIAL PARK, EDIFICIO M-1380, PONCE PR 00731
PO Box 359 Mercedita, PR 00715
TEL.787-848-6050 FAX: 787-848-6299

CSO# 20996 CUSTODY # 105454

Customer Company Name & Address:	Customer Contact (Print name & sign):
EC WASTE	María Vidal / María Vidal
Project Name: WATER TEST	
Project Address: PEÑUELAS, PR	Phone:

TURN AROUND TIME: | Rush | Days | Normal | Invoice to sample | Owner | Consultant

ANALYSIS TYPE		SAMPLE TYPE		SAMPLE MATRIX	# CONTAINERS
X Chemical	Microbiology	Source Water	Drinking Water	X Liquid	Sterile
ENVIRONMENTAL CONDITION		Waste Water	Food	Solid	2 Plastic
Sunny	Cloudy	Ground Water	Solid Waste	Oil	Glass
X Rainy	Windy	Soil	Composite HRS	Sludge	Vials
Fugitive Dust	Other	Seawater	X Grab	Other	Other

LAB. SAMPLE # (LAB USE)	DATE	TIME	SAMPLE DESCRIPTION OR SAMPLING POINT NUMBER
AE20_3527	6/29/20	1335	STORM WATER PUNTO MONITOREO
			N/A 6/30/20

METALS	WET CHEMISTRY		CHROMATOGRAPHY
Aluminum (A,C)	Acidity (A)	Phenol (A)	BTEX (A,E)
Antimony (A,C)	Alkalinity (A)	P. Total (A, B)	BTEX (A)
Arsenic (A,C)	Ammonia (A,B)	Res. Chlorine (A)	Chloroform as TTO (A) (E)
Barium (A,C)	Asbestos (A)	Set. Solids mg/L (A)	Dioxin (A)
Berrilium (A,C)	Bicarbonate (A)	Set. Solids ml/L (A)	MIBK(A)
Bismuth (A,C)	BOD-5 (A)	Silica (A)	MTBE(A)
Boron (A,C)	Bromide (A)	Solids Total (A)	PCB'S(A) 8082 608 (A)
Cadmium (A,C)	CaO MgO (1)	Sulfate(A)	Pesticide - TTO (A)
Calcium (A,C)	Carbonate (A)	Sulfide UND (D,H,A)	Phenols by GC (A)
Chromium (A,C)	Chloride (A)	Sulfite (A)	TBA (A)
Chromium VI (A,C)	COD (A,B)	Surfactant (A)	TPH D G O (A)
Cobalt (A,C)	Color ADMI (A)	X Suspended Solids (A)	TTO (A,E)
Cooper (A,C)	Color Pt-Co (A)	TDS (A)	TTO Semi-Volatile (A)
Gold (A)	Conductivity (A)	TKN (A,B)	VOC's - TTO (A)
Hardness (A,C)	Cyanide (A,D,G)	TOC (A,B)	MICROBIOLOGY
X Iron (A,C)	D.O (A)	Turbidity (A)	Total Coliform (A,F)
Lead (A,C)	Fluoride (A)		Fecal Coliform (A,F)
Lead (A)	Iodide (A)	RCRA	HPC (A,F)
Lithium (A,C)	Iodine (A)	Reactivity (A)	Enterococcus (A,F)
Magnesium (A,C)	MLV/SS (A)	Corrosivity (A)	E. Coli 0157 MPN (A,F)
Manganese (A,C)	Moisture (A)	Ignitability (A)	Mold & Yeast (A,F)
Mercury (A,C)	Nitrato & Nitrite (A)	Metals - TCLP (A)	Salmonella (A,F)
Molybdenum (A,C)	Nitrate (A)	Volatile - TCLP (A)	Campylobacter(A,F)
Nickel (A,C)	Nitrite (A)	Semi-Volatile-TCLP (A)	Listeria (A,F)
Potassium (A,C)	O&G Total (A,B)	Pesticide - TCLP (A)	FOOD ANALYSES
Selenium (A,C)	O&G TPH (A,B)	Herbicide - TCLP (A)	% Collagen
Silicon (A,C)	Ortho Phosphate (A,B)	TOX (A)	% FAT
Silver (A,C)			% Protein
Sodium (A,C)	O_2 mg/l		Water Activity - Aw
Strontium (A,C)		LEGEND PRESERVATION USED	
Thallium (A,C)	pH su	A Ice (Cool,4 °C)	E HCL
Tin (A,C)		B H_2SO_4	F Sodium Thiosfulfate
Titanium (A,C)	Temp °C	C HNO_3	G Ascorbic Acid
Vanadium (A,C)		D Na OH	H Zinc Acetate
Zinc (A,C)	Cl_2 mg/l	I Other:	

Comments & Special Instructions: PH Strip # HE998032

CONDITIONS OF SAMPLES UPON RECEIPT	TEMPERATURE OF SAMPLE	CONDITION SAMPLE	LABORATORY ACTION
Thermometer Serial # 8433	Room Temperature	Sample Intact	Sample Accepted
	Frozen	Properly Preserved	Sample Rejected
	RECEIVED AT 4 °C	Sample Compromised	

Sample Collected & Relinquished by (Print name & sign):	Date:	Received by (Print name & sign):	Date:	Delivery to Lab. by (Print name & sign):
María Vidal	Time:	JOSE A. / C. Lopez	Time: 11:39	Jose A. / C. Lopez
Company:	Collector ID#	Company: ALCHEM LABS	Collector ID#	Date: 6/30/20 Time: 12:30
Relinquished by (Print name & sign):	Date:	Received by (Print name & sign):	Date:	Received at Lab. by (Print name & sign):
	Time:		Time:	Carmen Lopez
Company:	Collector ID#	Company:	Collector ID#	Date: 6/30/20 Time: 1230

PROCEDURE NO: ALGAP008

All development of our analysis methods meet government regulatory agencies.